

Exhibit 11



HERITAGE-WTI, INC.
1250 St. George Street
East Liverpool, Ohio 43920-3400
Phone: 330-385-7337
Fax: 330-385-7813
Web Site: www.heritage-wti.com

OHSAS 18001: 2007
ISO 14001: 2004
ISO 9001: 2008

Mr. Eric Bewley
Division of Air Pollution Control
Northeast District Office
2110 East Aurora Road
Twinsburg, Ohio 44087

July 31, 2011
VIA AIR SERVICES

RE: HERITAGE-WTI, INC
QUARTERLY TITLE V REPORT
FACILITY ID 02-15-02-0233
2nd Quarter 2011

Dear Mr. Bewley:

Enclosed is Heritage-WTI, Inc's Quarterly Title V Report required by Section A(c)(ii) of WTI's Title V permit. This report covers the quarterly time period from April 1, 2011 through June 30, 2011.

This report reflects monitoring and reporting requirements outlined in the facility Permits to Install 02-18743 and 02-20067 as well as the Heritage-WTI Title V Permit #P0084372. Please note that the installation of emissions unit P006 has not been completed and will not be completed as described in Permit to Install #P0103856. As a result, Heritage-WTI allowed this PTI to expire on March 25, 2010. It is no longer included in this report.

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are certain penalties for submitting false information including the possibility of fine and imprisonment for knowing violations."

As always if you have any questions and/or comments feel free to contact me, or Vince Waggle, at 330-385-7337.

Sincerely,

A handwritten signature in black ink, appearing to read "John Peterka".

John Peterka
President
Heritage-WTI, Inc.



Recycled Paper

Enclosure

2011
2nd QUARTER
TITLE V REPORT

FOR

HERITAGE-WTI, INC

July 31, 2011

Section I – General Information

A. Facility Information

Facility ID:	02-15-02-0233
Responsible Official's Name / Title:	Frank Murray General Manager
Street Address:	1250 Saint George Street
City:	East Liverpool
State:	Ohio
Zip Code:	43920
Facility Name:	Heritage-WTI, Inc
Facility Local Contact Name:	Local contact is the same information as given above.

B. Relevant standard(s) or other requirement(s) that is/are the basis for this report:

OAC rule 3745-77-07(A)(3) – Monitoring and related recordkeeping and reporting requirements

C. Are you requesting a waiver of recordkeeping and/or reporting requirements under the applicable relevant standard(s) in conjunction with this report?

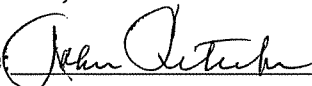
☐ Yes ☒ No

If you answered yes, you must submit the application for a waiver of recordkeeping and/or reporting requirements together with this report. The application for waiver should include whatever information you consider useful to convince the Administrator that a waiver of recordkeeping or recording is warranted. (63.10(f)(3))

Section II – Certification

Based upon information and belief formed after a reasonable inquiry, I as a responsible official of the above-mentioned facility, certify the information contained in this report is accurate and true to the best of my knowledge.

John Peterka, President

Signature: 

Date: 7/28/2011

Section III – Title V Permit Quarterly Reporting Requirements

A. Deviation Reporting

Emission units **F001** (Paved and Unpaved Roadways and Parking Areas), **F002** (Loose Solid Waste Receiving and Handling), **F004** (Pneumatic Lime and Activated Charcoal Handling System), and **N001** (Hazardous Waste Incinerator), **P001** (Container Processing) **P003** (Tanker Transfer Station – Bay 2), **P004** (Tanker Transfer Station – Bay 3), and **P005** (Direct Tanker Transfer Station –East Bay) have quarterly deviation reporting requirements as defined by Heritage-WTI's Title V Permit # P0084372.

Emission unit **B006** requires deviation reports to be sent to OEPA- NEDO within 30 days of becoming aware of an occurrence.

F001 Reporting Requirements:

- a. *Each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and*

There were no occurrences to report as defined by the reporting requirements for this unit.

- b. *Each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.*

There were no occurrences to report as defined by the reporting requirements for this unit.

F002 Reporting Requirements:

- a. *Any time when the vapor recovery system was not in operation when waste was processed within this emissions unit;*

6/9/2011 – at 1:45 pm power was lost to the facility due to a fire at a nearby substation and a resulting surge. The power surge resulted in an immediate shutdown of the incinerator and a brief shutdown of the vapor recovery system. The system was only down for a minute or two until the emergency generator was stabilized and power was restored.

- b. *Any time when emissions in the vapor recovery system were not vented to either the incinerator and/or the carbon adsorption system when waste was processed within this emissions unit;*

6/9/2011 – at 1:45 pm power was lost to the facility due to a fire at a nearby substation and a resulting surge. The power surge resulted in an immediate shutdown of the incinerator and a brief shutdown of the vapor recovery system. The system was only down for a minute or two until the emergency generator was stabilized and power was restored.

- c. *Any record indicating the pressure within the vapor recovery system upstream from the ventilation header blower was at or above atmospheric pressure when waste was processed within this emissions unit;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- d. *Any record indicating detectable emissions from the vapor recovery system or from any equipment component of this emissions unit;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- e. *An identification of the days when cracks, openings, broken seals, or any other condition allowing outward flow from the emissions unit were discovered by the daily inspection of the overhead doors and/or enclosure and a description of the corrective action, and when it was performed; and*

There were no occurrences to report as defined by the reporting requirements for this unit.

- f. *An identification of the days during which visible emissions of fugitive dust were observed when the overhead doors were opened and a description of any corrective actions taken, if any, to minimize or eliminate the visible emissions.*

There were no occurrences to report as defined by the reporting requirements for this unit.

F003 Reporting Requirements:

- a. *Each day when the enclosures were not found to be in good operating condition and the corrective actions taken; and*

There were no occurrences to report as defined by the reporting requirements for this unit.

- b. *Each day or week during which any fugitive visible emission were observed and the corrective actions taken.*

There were no occurrences to report as defined by the reporting requirements for this unit.

F004 Reporting Requirements:

- a. *The period of time when the pressure drop across the bag house on the lime silo stack was outside the range specified in section A.III.1;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- b. *Each day when the enclosures were not found to be in good operating condition and the corrective actions taken; and*

There were no occurrences to report as defined by the reporting requirements for this unit.

- c. *Each day or week during which any fugitive visible emission were observed and the corrective actions taken.*

There were no occurrences to report as defined by the reporting requirements for this unit.

P001 Reporting Requirements:

- a. *Any time when the vapor recovery system was not in operation when waste was processed within this emissions unit;*

6/9/2011 – at 1:45 pm power was lost to the facility due to a fire at a nearby substation and a resulting surge. The power surge resulted in an immediate shutdown of the incinerator and a brief shutdown of the vapor recovery system. The system was only down for a minute or two until the emergency generator was stabilized and power was restored. Waste processing in this area was halted when the power was lost.

- b. *Any time when emissions in the vapor recovery system were not vented to either the incinerator and/or the carbon adsorption system when waste was processed within this emissions unit;*

6/9/2011 – at 1:45 pm power was lost to the facility due to a fire at a nearby substation and a resulting surge. The power surge resulted in an immediate shutdown of the incinerator and a brief shutdown of the vapor recovery system. The system was only down for a minute or two until the emergency generator was stabilized and power was restored. Waste processing in this area was halted when the power was lost.

- c. *Any record indicating the pressure within the vapor recovery system upstream from the ventilation header blower was at or above atmospheric pressure when waste was processed within this emissions unit;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- d. *Any record indicating detectable emissions from the vapor recovery system, cover and/ or opening of any container, and/ or any equipment component of this emissions unit;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- e. *Each day or week during which any visible emissions were observed and the corrective actions taken.*

There were no occurrences to report as defined by the reporting requirements for this unit.

P003 – P005 Reporting Requirements:

The emissions units have the same reporting requirements and therefore will be combined for the purpose of this report. The specific emission unit will be identified, if necessary, in the contents of this section.

- f. *Each day when the number of gallons loaded exceeded 44,000 gallons;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- g. *Each day when the calculated loading loss value exceeded 41.9 pounds per 1,000 gallons;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- h. Any time when the vapor recovery system was not in operation when waste was processed within this emissions unit;*

6/9/2011 – at 1:45 pm power was lost to the facility due to a fire at a nearby substation and a resulting surge. The power surge resulted in an immediate shutdown of the incinerator and a brief shutdown of the vapor recovery system. The system was only down for a minute or two until the emergency generator was stabilized and power was restored. Waste processing in this area was halted when the power was lost.

- i. Any time when emissions in the vapor recovery system were not vented to either the incinerator and/or the carbon adsorption system when waste was processed within this emissions unit;*

6/9/2011 – at 1:45 pm power was lost to the facility due to a fire at a nearby substation and a resulting surge. The power surge resulted in an immediate shutdown of the incinerator and a brief shutdown of the vapor recovery system. The system was only down for a minute or two until the emergency generator was stabilized and power was restored. Waste processing in this area was halted when the power was lost.

- j. Any record indicating the pressure within the vapor recovery system upstream from the ventilation header blower was at or above atmospheric pressure when waste was processed within this emissions unit;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- k. Each day when loading occurred without submerged fill;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- l. Any record indicating detectable emissions from the vapor recovery system or from any equipment component of this emissions unit;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- m. Any record indicating the loading and unloading activities occurred at the same time within this emissions unit.*

There were no occurrences to report as defined by the reporting requirements for this unit.

N001 Reporting Requirements:

Heritage-WTI is required to submit quarterly reports documenting exceedances of emissions limitations and other operating parameters specified by the Title V Permit #P0084372. In addition, the permit also specifies that Heritage-WTI provide quarterly reports on the performance of the Continuous Monitoring System (CMS).

This Title V Quarterly Report will only contain a summary of the quarter's exceedances and CMS downtime. A more detailed report will be submitted to OEPA under a separated cover letter titled **2nd Quarter Excess Emissions Report**. An additional report titled **2nd Quarter Data Assessment Report** will be sent detailing the results of the periodic Cylinder Gas Audits and Relative Accuracy Test Audits.

Temperature Deviation Summary

Heritage-WTI maintains two temperature Operating Parameter Limits in accordance 40 CFR Part 63, Subpart EEE. Temperature limits for the Rotary Kiln and Secondary Combustion Chamber are necessary maintain the temperature needed to meet the Destruction Removal Efficiency and Dioxin/Furan emission standards established under the HWC MACT.

Kiln Temp Summary

Deviation = < 1718 F 1-hr avg.

Date	MINIMUM TEMP DEG F	Duration (min)	Reason	Corrective Action
04/12/2011 23:00	725.5	480	Shutdown - Prior AWFCO	Repaired outlet duct. Restarted unit
06/09/2011 14:12	1120.5	247	Shutdown - Power Loss	AEP restored power. Unit restarted.
		727	Total Minutes	

SCC Temp Summary

Deviation = <1747 F 1-hr avg.

Date	MINIMUM TEMP DEG F	Duration (min)	Reason	Corrective Action
04/12/2011 22:57	729.9	483	Shutdown - Prior AWFCO	Repaired outlet duct. Restarted unit
06/09/2011 14:23	964.8	236	Shutdown - Power Loss	AEP restored power. Unit restarted.
		719	Total Minutes	

Opacity Summary
 Deviation = > 20% on 6 min. avg.

Date	MAXIMUM OPACITY	Duration (min)	Reason	Corrective Action
04/07/2011 13:30	33.0	5	Pink Plume Supression - Failure	Repaired Pump.
05/17/2011 07:30	21.9	6	Feed - Drum	Reduced Feed Rates
06/01/2011 10:18	72.2	6	Maintenance - Activity	Cleaned Lens
06/02/2011 14:06	49.0	8	Quarterly Stack Audit	None
06/09/2011 13:54	62.7	6	Power Outage	Restored Power
		31	Total 6-Minute Averages	

Opacity

Emission Data Summary:

- 1) Duration of excess emission in reporting period due to (all reported in minutes; excludes monitor downtime events):
 - a) Startup / shutdown: 0
 - b) Control equipment problems: 5
 - c) Process Problems: 0
 - d) Other known causes: 26
 - e) Unknown causes: 0
- 2) Total duration of excess emissions: 31
- 3) Total duration of excess emissions X (100) / Total source operating time: 0.02%

CMS Performance Summary:

- 1) CMS downtime in reporting period due to (reported in minutes; does not count preventative maintenance time):
 - a) Monitor equipment malfunctions: 0
 - b) Non-Monitor equipment malfunctions: 0
 - c) Quality assurance calibration: 639
 - d) Other known causes: 2
 - e) Unknown causes: 0
- 2) Total CMS Downtime: 641
- 3) Total duration of downtime X (100) / Total source operating time: 0.54%

Sulfur Dioxide Summary

Deviation = >11.34 lbs/hr
 49.69 tons/year

Date	MAXIMUM LB/MMBTU	Duration (min)	Reason	Corrective Action
05/02/2011 07:40	14.4	13	Feed - Drum	Reduced Feed Rates
05/05/2011 04:40	11.6	31	Feed - Direct Tanker	Reduced Feed Rates
05/27/2011 04:00	13.6	34	Feed - Drum	Reduced Feed Rates
05/31/2011 10:26	28.0	162	Feed - Lance	Reduced Feed Rates
06/03/2011 17:56	20.1	116	Feed - Lance	Reduced Feed Rates
06/03/2011 22:07	30.3	68	Feed - Lance	Reduced Feed Rates
06/04/2011 07:01	28.7	66	Feed - Lance	Reduced Feed Rates
06/06/2011 07:18	18.4	63	Feed - Drum	Reduced Feed Rates
06/11/2011 07:13	12.6	26	Feed - Lance	Reduced Feed Rates
06/16/2011 11:47	11.9	47	Feed - Lance	Reduced Feed Rates
06/17/2011 15:02	35.3	97	Feed - Drum	Reduced Feed Rates
06/17/2011 21:03	11.9	17	Feed - Drum	Reduced Feed Rates
		740	Total Minutes	

Sulfur Dioxide

Emission Data Summary:

1) Duration of excess emission in reporting period due to (all reported in minutes; excludes monitor downtime events):

- a) Startup / shutdown: 0
- b) Control equipment problems: 0
- c) Process Problems: 0
- d) Other known causes: 740
- e) Unknown causes: 0

2) Total duration of excess emissions: 740

3) Total duration of excess emissions X (100) / Total source operating time: 0.63%

CMS Performance Summary:

1) CMS downtime in reporting period due to (reported in minutes; does not count preventative maintenance time):

- a) Monitor equipment malfunctions: 0
- b) Non-Monitor equipment malfunctions: 0
- c) Quality assurance calibration: 1,952
- d) Other known causes: 63
- e) Unknown causes: 0

2) Total CMS Downtime: 2,015

3) Total duration of downtime X (100) / Total source operating time: 1.71%

Nitrogen Oxides Summary

Deviation=>28.36 lbs/hr
 124.23 Tons/year

Date	MAXIMUM LB/HR	Duration (min)	Reason	Corrective Action
04/01/2011 18:30	34.0	56	Feed - Lance	Adjusted feed.
04/09/2011 02:54	28.5	4	Feed - Drum	Reduced Feed Rates
04/09/2011 15:12	28.7	11	Feed - Drum	Reduced Feed Rates
04/10/2011 01:56	28.5	10	Feed - Drum	Reduced Feed Rates
04/11/2011 21:10	33.9	92	Feed - Drum	Reduced Feed Rates
04/11/2011 22:50	30.2	39	Feed - Drum	Reduced Feed Rates
04/27/2011 19:56	29.0	6	Feed - Lance	Adjusted feed.
05/05/2011 22:39	30.7	51	Feed - Lance	Adjusted feed.
05/06/2011 00:45	29.5	16	Feed - Lance	Adjusted feed.
05/06/2011 01:07	29.8	32	Feed - Lance	Adjusted feed.
05/06/2011 05:30	34.7	49	Feed - Lance	Adjusted feed.
05/09/2011 20:48	33.5	60	Feed - Lance	Adjusted feed.
06/08/2011 12:13	36.0	48	Feed - Lance	Adjusted feed.
06/15/2011 16:20	28.8	8	Feed - Lance	Adjusted feed.
06/16/2011 22:59	31.8	65	Feed - Lance	Adjusted feed.
06/24/2011 22:30	28.9	19	Feed - Lance	Adjusted feed.
		566	Total Minutes	

Nitrogen Oxide

Emission Data Summary:

1) Duration of excess emission in reporting period due to (all reported in minutes; excludes monitor downtime events):

- a) Startup / shutdown: 0
- b) Control equipment problems: 0
- c) Process Problems: 0
- d) Other known causes: 566
- e) Unknown causes: 0

2) Total duration of excess emissions: 566

3) Total duration of excess emissions X (100) / Total source operating time: 0.48%

CMS Performance Summary:

1) CMS downtime in reporting period due to (reported in minutes; does not count preventative maintenance time):

- a) Monitor equipment malfunctions: 0
- b) Non-Monitor equipment malfunctions: 0
- c) Quality assurance calibration: 1,952
- d) Other known causes: 63
- e) Unknown causes: 0

2) Total CMS Downtime: 2,053

3) Total duration of downtime X (100) / Total source operating time: 1.71%

Carbon Monoxide Summary

Deviation = N/A

The HWC MACT (40 CFR Part 63, Subpart EEE) allows facilities the option of choosing to maintain compliance by monitoring either Total Hydrocarbon or Carbon Monoxide emissions. Heritage-WTI has chosen to option of monitoring Total Hydrocarbons. As a result, the facility does not have a short term emission limitation on Carbon Monoxide. The following table shows a summary of Carbon Monoxide emissions for the quarter.

Date	Time	Lb/MMBtu	Incinerator Operation
Total CO emissions for the quarter:			
		lbs	tons
		22621	11.31

Carbon Monoxide

Emission Data Summary:

1) Duration of excess emission in reporting period due to (all reported in minutes; excludes monitor downtime events):

- a) Startup / shutdown: N/A
- b) Control equipment problems: N/A
- c) Process Problems: N/A
- d) Other known causes: N/A
- e) Unknown causes: N/A

2) Total duration of excess emissions: N/A

3) Total duration of excess emissions X (100) / Total source operating time: N/A %

CMS Performance Summary:

1) CMS downtime in reporting period due to (reported in minutes; does not count preventative maintenance time):

- a) Monitor equipment malfunctions: 0
- b) Non-Monitor equipment malfunctions: 0
- c) Quality assurance calibration: 975
- d) Other known causes: 42
- e) Unknown causes: 0

2) Total CMS Downtime: 1,017

3) Total duration of downtime X (100) / Total source operating time: 0.86%

Total Hydrocarbon Summary

Deviation => 10 ppmv

The HWC MACT (40 CFR Part 63, Subpart EEE) allows facilities the option of choosing to maintain compliance by monitoring either Total Hydrocarbon or Carbon Monoxide emissions. Heritage-WTI has chosen to option of monitoring Total Hydrocarbons. The following table shows a summary of Total Hydrocarbon exceedances and total emissions for the quarter.

Date	MAXIMUM PPM	Duration (min)	Reason	Corrective Action
04/01/2011 16:35	15.2	58	Malfunction - Combustion Anomaly	Reviewed waste feeds. Restarted unit.
04/01/2011 23:45	11.7	35	Operator Error- Feed Prep	Reduced charge size. Restarted unit.
04/04/2011 01:45	11.4	30	Malfunction - Lance Slagging	Cleaned lances. Restarted unit.
04/05/2011 04:54	18.3	57	Operator Error - Low Air Flow	Increased air flow. Restarted unit.
04/05/2011 22:40	11.9	58	Malfunction - Lance Plugging	Cleared lance. Restarted unit.
04/06/2011 18:07	10.9	34	Malfunction - Combustion Anomaly	Reviewed waste feeds. Restarted unit.
04/09/2011 17:31	15.9	58	Operator Error - Feed Mix	Reduced feeds. Restarted unit.
04/10/2011 07:27	13.5	49	Malfunction - Lance Slagging	Inspected and cleaned lances on 4/11/11.
04/10/2011 10:08	14.5	37	Malfunction - Lance Slagging	Inspected and cleaned lances on 4/11/11.
04/10/2011 12:29	12.8	54	Malfunction - Lance Slagging	Inspected and cleaned lances on 4/11/11.
04/12/2011 22:44	19.0	60	Shutdown - Prior AWFCO	Repaired outlet duct. Restarted unit
05/06/2011 20:03	23.5	62	Operator Error - Feed Prep	Created new waste stream to segregate materials better.
05/10/2011 23:50	12.6	59	Malfunction - Clinker Fell	Regained draft and restarted unit
05/20/2011 14:15	26.2	61	Operator Error - Lance Feed	Restarted unit. Reduced lance flow.
06/07/2011 21:07	13.1	57	Operator Error - Feed Prep	Solidified material. Restarted unit.
06/24/2011 02:48	10.3	58	Operator Error - Feed Prep	Reduced charge size and restarted unit.
		827	Total Minutes	
THC on Fuels				
04/22/2011 06:59	39.0	80	Start-Up	Adjusted Burner
06/21/2011 22:48	10.6	8	Start-Up	Adjusted Burner
		88	Total Minutes	

Total Hydrocarbon

Emission Data Summary:

1) Duration of excess emission in reporting period due to (all reported in minutes; excludes monitor downtime events):

- a) Startup / shutdown: 148
- b) Control equipment problems: 0
- c) Process Problems: 287
- d) Other known causes: 388
- e) Unknown causes: 92

2) Total duration of excess emissions: 915

3) Total duration of excess emissions X (100) / Total source operating time: 0.78%

CMS Performance Summary:

1) CMS downtime in reporting period due to (reported in minutes; does not count preventative maintenance time):

a) Monitor equipment malfunctions:	0
b) Non-Monitor equipment malfunctions:	0
c) Quality assurance calibration:	0
d) Other known causes:	2
e) Unknown causes:	0

2) Total CMS Downtime: 2

3) Total duration of downtime X (100) / Total source operating time: 0.0002%

B. Malfunctions

As historically required by former terms and conditions, WTI has included all monitor quality assurance, preventative maintenance, and downtime in the exceedance section of the Excess Emissions Report (EER) for all N001 monitors. Malfunctions of the monitor would be reported in the downtime section of the EER. This EER is submitted separate from this Title V report.

End of Report

Bcc: Env. Department

ECF: Air Quarterly Reporting / Title V Permit / Deviation Report

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HERITAGE-WTI, INC.
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Mr. Eric Bewley
Division of Air Pollution Control
Northeast District Office
2110 East Aurora Road
Twinsburg, Ohio 44087

October 31, 2011
VIA AIR SERVICES

RE: HERITAGE-WTI, INC
QUARTERLY TITLE V REPORT
FACILITY ID 02-15-02-0233
3rd Quarter 2011

Dear Mr. Bewley:

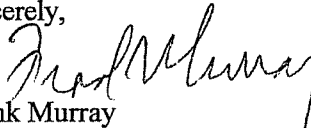
Enclosed is Heritage-WTI, Inc's Quarterly Title V Report required by Section A(c)(ii) of WTI's Title V permit. This report covers the quarterly time period from **July 1, 2011 through September 30, 2011**.

This report reflects monitoring and reporting requirements outlined in the facility Permits to Install 02-18743 and 02-20067 as well as the Heritage-WTI Title V Permit #P0084372. Please note that the installation of emissions unit P006 has not been completed and will not be completed as described in Permit to Install #P0103856. As a result, Heritage-WTI allowed this PTI to expire on March 25, 2010. It is no longer included in this report.

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are certain penalties for submitting false information including the possibility of fine and imprisonment for knowing violations."

As always if you have any questions and/or comments feel free to contact me, or Vince Waggle, at 330-385-7337.

Sincerely,


Frank Murray
General Manager
Heritage-WTI, Inc.

Enclosure

2011
3rd QUARTER
TITLE V REPORT

FOR

HERITAGE-WTI, INC

October 31, 2011

Section I – General Information

A. Facility Information

Facility ID:	02-15-02-0233
Responsible Official's Name / Title:	Frank Murray General Manager
Street Address:	1250 Saint George Street
City:	East Liverpool
State:	Ohio
Zip Code:	43920
Facility Name:	Heritage-WTI, Inc
Facility Local Contact Name:	Local contact is the same information as given above.

B. Relevant standard(s) or other requirement(s) that is/are the basis for this report:

OAC rule 3745-77-07(A)(3) – Monitoring and related recordkeeping and reporting requirements

C. Are you requesting a waiver of recordkeeping and/or reporting requirements under the applicable relevant standard(s) in conjunction with this report?


☐ Yes ☒ No

If you answered yes, you must submit the application for a waiver of recordkeeping and/or reporting requirements together with this report. The application for waiver should include whatever information you consider useful to convince the Administrator that a waiver of recordkeeping or recording is warranted. (63.10(f)(3))

Section II – Certification

Based upon information and belief formed after a reasonable inquiry, I as a responsible official of the above-mentioned facility, certify the information contained in this report is accurate and true to the best of my knowledge.

Frank Murray, General Manager

Signature: 

Date: 10/18/2011

Section III – Title V Permit Quarterly Reporting Requirements

A. Deviation Reporting

Emission units **F001** (Paved and Unpaved Roadways and Parking Areas), **F002** (Loose Solid Waste Receiving and Handling), **F004** (Pneumatic Lime and Activated Charcoal Handling System), and **N001** (Hazardous Waste Incinerator), **P001** (Container Processing) **P003** (Tanker Transfer Station – Bay 2), **P004** (Tanker Transfer Station – Bay 3), and **P005** (Direct Tanker Transfer Station –East Bay) have quarterly deviation reporting requirements as defined by Heritage-WTI's Title V Permit # P0084372.

Emission unit **B006** requires deviation reports to be sent to OEPA- NEDO within 30 days of becoming aware of an occurrence.

F001 Reporting Requirements:

- a. *Each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and*

There were no occurrences to report as defined by the reporting requirements for this unit.

- b. *Each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.*

There were no occurrences to report as defined by the reporting requirements for this unit.

F002 Reporting Requirements:

- a. *Any time when the vapor recovery system was not in operation when waste was processed within this emissions unit;*

8/9/2011 – at approximately 10:20 am, power was briefly lost to the facility due to a city-wide outage. The power loss resulted in an immediate shutdown of the incinerator while the emergency generator was brought online. Negative draft was also lost in the vapor recovery system. Pressure in the system was recorded at 0.0 inches of water for 33 minutes. Waste was present in this unit at this time through processing was taking place. The system was stabilized at 10:55 am.

- b. *Any time when emissions in the vapor recovery system were not vented to either the incinerator and/or the carbon adsorption system when waste was processed within this emissions unit;*

8/9/2011 – at approximately 10:20 am, power was briefly lost to the facility due to a city-wide outage. The power loss resulted in an immediate shutdown of the incinerator while the emergency generator was brought online. Negative draft was also lost in the vapor recovery system. Pressure in the system was recorded at 0.0 inches of water for 33 minutes. Waste was present in this unit at this time through processing was taking place. The system was stabilized at 10:55 am.

- c. *Any record indicating the pressure within the vapor recovery system upstream from the ventilation header blower was at or above atmospheric pressure when waste was processed within this emissions unit;*

8/9/2011 – at approximately 10:20 am, power was briefly lost to the facility due to a city-wide outage. The power loss resulted in an immediate shutdown of the incinerator while the emergency generator was brought online. Negative draft was also lost in the vapor recovery system. Pressure in the system was recorded at 0.0 inches of water for 33 minutes. Waste was present in this unit at this time through processing was taking place. The system was stabilized at 10:55 am.

- d. *Any record indicating detectable emissions from the vapor recovery system or from any equipment component of this emissions unit;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- e. *An identification of the days when cracks, openings, broken seals, or any other condition allowing outward flow from the emissions unit were discovered by the daily inspection of the overhead doors and/or enclosure and a description of the corrective action, and when it was performed; and*

There were no occurrences to report as defined by the reporting requirements for this unit.

- f. *An identification of the days during which visible emissions of fugitive dust were observed when the overhead doors were opened and a description of any corrective actions taken, if any, to minimize or eliminate the visible emissions.*

There were no occurrences to report as defined by the reporting requirements for this unit.

F003 Reporting Requirements:

- a. *Each day when the enclosures were not found to be in good operating condition and the corrective actions taken; and*

There were no occurrences to report as defined by the reporting requirements for this unit.

- b. *Each day or week during which any fugitive visible emission were observed and the corrective actions taken.*

There were no occurrences to report as defined by the reporting requirements for this unit.

F004 Reporting Requirements:

- a. *The period of time when the pressure drop across the bag house on the lime silo stack was outside the range specified in section A.III.1;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- b. *Each day when the enclosures were not found to be in good operating condition and the corrective actions taken; and*

There were no occurrences to report as defined by the reporting requirements for this unit.

- c. *Each day or week during which any fugitive visible emission were observed and the corrective actions taken.*

There were no occurrences to report as defined by the reporting requirements for this unit.

P001 Reporting Requirements:

- a. *Any time when the vapor recovery system was not in operation when waste was processed within this emissions unit;*

8/9/2011 – at approximately 10:20 am, power was briefly lost to the facility due to a city-wide outage. The power loss resulted in an immediate shutdown of the incinerator while

the emergency generator was brought online. Negative draft was also lost in the vapor recovery system. Pressure in the system was recorded at 0.0 inches of water for 33 minutes. All open containers in this area were closed immediately upon discovery of the loss of vapor recovery. The system was stabilized at 10:55 am.

- b. *Any time when emissions in the vapor recovery system were not vented to either the incinerator and/or the carbon adsorption system when waste was processed within this emissions unit;*

8/9/2011 – at approximately 10:20 am, power was briefly lost to the facility due to a city-wide outage. The power loss resulted in an immediate shutdown of the incinerator while the emergency generator was brought online. Negative draft was also lost in the vapor recovery system. Pressure in the system was recorded at 0.0 inches of water for 33 minutes. All open containers in this area were closed immediately upon discovery of the loss of vapor recovery. The system was stabilized at 10:55 am.

- c. *Any record indicating the pressure within the vapor recovery system upstream from the ventilation header blower was at or above atmospheric pressure when waste was processed within this emissions unit;*

8/9/2011 – at approximately 10:20 am, power was briefly lost to the facility due to a city-wide outage. The power loss resulted in an immediate shutdown of the incinerator while the emergency generator was brought online. Negative draft was also lost in the vapor recovery system. Pressure in the system was recorded at 0.0 inches of water for 33 minutes. All open containers in this area were closed immediately upon discovery of the loss of vapor recovery. The system was stabilized at 10:55 am.

- d. *Any record indicating detectable emissions from the vapor recovery system, cover and/ or opening of any container, and/ or any equipment component of this emissions unit;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- e. *Each day or week during which any visible emissions were observed and the corrective actions taken.*

There were no occurrences to report as defined by the reporting requirements for this unit.

P003 – P005 Reporting Requirements:

The emissions units have the same reporting requirements and therefore will be combined for the purpose of this report. The specific emission unit will be identified, if necessary, in the contents of this section.

- f. Each day when the number of gallons loaded exceeded 44,000 gallons;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- g. Each day when the calculated loading loss value exceeded 41.9 pounds per 1,000 gallons;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- h. Any time when the vapor recovery system was not in operation when waste was processed within this emissions unit;*

8/9/2011 – at approximately 10:20 am, power was briefly lost to the facility due to a city-wide outage. The power loss resulted in an immediate shutdown of the incinerator while the emergency generator was brought online. Negative draft was also lost in the vapor recovery system. Pressure in the system was recorded at 0.0 inches of water for 33 minutes. All operations in this area were ceased immediately upon discovery of the loss of vapor recovery. The system was stabilized at 10:55 am.

- i. Any time when emissions in the vapor recovery system were not vented to either the incinerator and/or the carbon adsorption system when waste was processed within this emissions unit;*

8/9/2011 – at approximately 10:20 am, power was briefly lost to the facility due to a city-wide outage. The power loss resulted in an immediate shutdown of the incinerator while the emergency generator was brought online. Negative draft was also lost in the vapor recovery system. Pressure in the system was recorded at 0.0 inches of water for 33 minutes. All operations in this area were ceased immediately upon discovery of the loss of vapor recovery. The system was stabilized at 10:55 am.

- j. Any record indicating the pressure within the vapor recovery system upstream from the ventilation header blower was at or above atmospheric pressure when waste was processed within this emissions unit;*

8/9/2011 – at approximately 10:20 am, power was briefly lost to the facility due to a city-wide outage. The power loss resulted in an immediate shutdown of the incinerator while the emergency generator was brought online. Negative draft was also lost in the vapor recovery system. Pressure in the system was recorded at 0.0 inches of water for 33 minutes. All operations in this area were ceased immediately upon discovery of the loss of vapor recovery. The system was stabilized at 10:55 am.

- k. Each day when loading occurred without submerged fill;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- l. Any record indicating detectable emissions from the vapor recovery system or from any equipment component of this emissions unit;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- m. Any record indicating the loading and unloading activities occurred at the same time within this emissions unit.*

There were no occurrences to report as defined by the reporting requirements for this unit.

N001 Reporting Requirements:

Heritage-WTI is required to submit quarterly reports documenting exceedances of emissions limitations and other operating parameters specified by the Title V Permit #P0084372. In addition, the permit also specifies that Heritage-WTI provide quarterly reports on the performance of the Continuous Monitoring System (CMS).

This Title V Quarterly Report will only contain a summary of the quarter's exceedances and CMS downtime. A more detailed report will be submitted to OEPA under a separated cover letter titled **3rd Quarter Excess Emissions Report**. An additional report titled **3rd Quarter Data Assessment Report** will be sent detailing the results of the periodic Cylinder Gas Audits and Relative Accuracy Test Audits.

Temperature Deviation Summary

Heritage-WTI maintains two temperature Operating Parameter Limits in accordance 40 CFR Part 63, Subpart EEE. Temperature limits for the Rotary Kiln and Secondary Combustion Chamber are necessary maintain the temperature needed to meet the Destruction Removal Efficiency and Dioxin/Furan emission standards established under the HWC MACT.

Kiln Temp Summary

Deviation = < 1718 F 1-hr avg.

Date	MINIMUM TEMP DEG F	Duration (min)	Reason	Corrective Action
08/09/2011 10:40	1640.2	38	Malfunction - Power Failure	Power restored within minutes. Unit restarted.
08/25/2011 04:08	1529.6	44	Malfunction - Power Failure	Power restored within minutes. Unit restarted.
09/26/2011 18:55	928.9	139	Malfunction - Instrument	Replaced transmitter, cooled motor. Restarted unit.
09/26/2011 23:11	1248.3	143	Malfunction - Instrument	Replaced transmitter, cooled motor. Restarted unit.
		364	Total Minutes	

SCC Temp Summary

Deviation = <1747 F 1-hr avg.

Date	MINIMUM TEMP DEG F	Duration (min)	Reason	Corrective Action
08/09/2011 10:33	1577.1	45	Malfunction - Power Failure	Power restored within minutes. Unit restarted.
08/25/2011 04:10	1565.1	42	Malfunction - Power Failure	Power restored within minutes. Unit restarted.
09/26/2011 19:02	944.0	132	Malfunction - Instrument	Replaced transmitter, cooled motor. Restarted unit.
09/26/2011 23:12	1212.6	145	Malfunction - Instrument	Replaced transmitter, cooled motor. Restarted unit.
		364	Total Minutes	

Opacity Summary
 Deviation = > 20% on 6 min. avg.

Date	MAXIMUM OPACITY	Duration (min)	Reason	Corrective Action
07/20/2011 14:42	72.0	1032	Malfunction - Reheat Maintenance	Repaired heat exchanger.
08/31/2011 13:12	25.5	60	Quarterly Stack Audit	NONE
		1092	Total Minutes	

Opacity

Emission Data Summary:

1) Duration of excess emission in reporting period due to (all reported in minutes; excludes monitor downtime events):

- a) Startup / shutdown: 0
- b) Control equipment problems: 1032
- c) Process Problems: 0
- d) Other known causes: 60
- e) Unknown causes: 0

2) Total duration of excess emissions: 1092

3) Total duration of excess emissions X (100) / Total source operating time: 0.87%

CMS Performance Summary:

1) CMS downtime in reporting period due to (reported in minutes; does not count preventative maintenance time):

- a) Monitor equipment malfunctions: 0
- b) Non-Monitor equipment malfunctions: 0
- c) Quality assurance calibration: 647
- d) Other known causes: 0
- e) Unknown causes: 0

2) Total CMS Downtime: 647

3) Total duration of downtime X (100) / Total source operating time: 0.51%

Sulfur Dioxide Summary

Deviation =>11.34 lbs/hr
 49.69 tons/year

Date	MAXIMUM LB/MMBTU	Duration (min)	Reason	Corrective Action
08/06/2011 01:47	15.7	52	Feed - Drum	Reduced Feed Rates
08/15/2011 09:00	13.5	50	Feed - Drum	Reduced Feed Rates
08/19/2011 05:12	11.6	35	Feed - Drum	Reduced Feed Rates
08/21/2011 16:50	17.1	54	Feed - Drum	Reduced Feed Rates
08/26/2011 09:53	13.5	50	Feed - Drum	Reduced Feed Rates
08/29/2011 07:01	55.5	21	Instrument Calibration	NONE
08/29/2011 15:23	16.6	51	Instrument Calibration	NONE
08/31/2011 21:51	16.5	55	Feed - Drum	Reduced Feed Rates
09/04/2011 08:30	31.9	78	Feed - Drum	Reduced Feed Rates
09/04/2011 11:44	22.5	62	Feed - Drum	Reduced Feed Rates
09/06/2011 17:36	18.4	56	Feed - Drum	Reduced Feed Rates
09/08/2011 20:43	13.4	50	Feed - Drum	Reduced Feed Rates
09/12/2011 11:38	33.1	81	Feed - Drum	Reduced Feed Rates
09/13/2011 18:05	11.5	3	Feed - Drum	Reduced Feed Rates
09/13/2011 18:17	13.3	15	Feed - Drum	Reduced Feed Rates
09/13/2011 18:55	12.8	7	Feed - Drum	Reduced Feed Rates
		720	Total Minutes	

Sulfur Dioxide

Emission Data Summary:

- 1) Duration of excess emission in reporting period due to (all reported in minutes; excludes monitor downtime events):
 - a) Startup / shutdown: 0
 - b) Control equipment problems: 72
 - c) Process Problems: 0
 - d) Other known causes: 648
 - e) Unknown causes: 0
- 2) Total duration of excess emissions: 720
- 3) Total duration of excess emissions X (100) / Total source operating time: 0.57%

CMS Performance Summary:

- 1) CMS downtime in reporting period due to (reported in minutes; does not count preventative maintenance time):
 - a) Monitor equipment malfunctions: 0
 - b) Non-Monitor equipment malfunctions: 0
 - c) Quality assurance calibration: 1,962
 - d) Other known causes: 22
 - e) Unknown causes: 0
- 2) Total CMS Downtime: 1,984
- 3) Total duration of downtime X (100) / Total source operating time: 1.56

Nitrogen Oxides Summary

Deviation=>28.36 lbs/hr
 124.23 Tons/year

Date	MAXIMUM LB/HR	Duration (min)	Reason	Corrective Action
07/20/2011 05:39	28.8	2	Feed - Drum	Reduced Feed Rates
07/20/2011 05:42	28.5	1	Feed - Drum	Reduced Feed Rates
07/25/2011 04:26	28.5	6	Feed - Drum	Reduced Feed Rates
08/30/2011 01:42	34.5	38	Feed - Drum	Reduced Feed Rates
08/31/2011 18:30	28.9	5	Feed - Drum	Reduced Feed Rates
09/03/2011 00:56	29.1	33	Feed - Drum	Reduced Feed Rates
09/03/2011 05:27	29.1	19	Feed - Drum	Reduced Feed Rates
09/08/2011 05:24	29.1	7	Feed - Drum	Reduced Feed Rates
09/08/2011 23:02	29.1	5	Feed - Drum	Reduced Feed Rates
09/08/2011 23:26	30.3	10	Feed - Drum	Reduced Feed Rates
		126	Total Minutes	

Nitrogen Oxide

Emission Data Summary:

1) Duration of excess emission in reporting period due to (all reported in minutes; excludes monitor downtime events):

- a) Startup / shutdown: 0
- b) Control equipment problems: 0
- c) Process Problems: 0
- d) Other known causes: 126
- e) Unknown causes: 0

2) Total duration of excess emissions: 126

3) Total duration of excess emissions X (100) / Total source operating time: 0.10%

CMS Performance Summary:

1) CMS downtime in reporting period due to (reported in minutes; does not count preventative maintenance time):

- a) Monitor equipment malfunctions: 0
- b) Non-Monitor equipment malfunctions: 0
- c) Quality assurance calibration: 1,962
- d) Other known causes: 22
- e) Unknown causes: 0

2) Total CMS Downtime: 1,984

3) Total duration of downtime X (100) / Total source operating time: 1.56%

Carbon Monoxide Summary

Deviation = N/A

The HWC MACT (40 CFR Part 63, Subpart EEE) allows facilities the option of choosing to maintain compliance by monitoring either Total Hydrocarbon or Carbon Monoxide emissions. Heritage-WTI has chosen to option of monitoring Total Hydrocarbons. As a result, the facility does not have a short term emission limitation on Carbon Monoxide. The following table shows a summary of Carbon Monoxide emissions for the quarter.

Date	Time	Lb/MMBtu	Incinerator Operation
Total CO emissions for the quarter:			
		lbs	tons
		23603	11.80

Carbon Monoxide

Emission Data Summary:

- 1) Duration of excess emission in reporting period due to (all reported in minutes; excludes monitor downtime events):
 - a) Startup / shutdown: N/A
 - b) Control equipment problems: N/A
 - c) Process Problems: N/A
 - d) Other known causes: N/A
 - e) Unknown causes: N/A
- 2) Total duration of excess emissions: N/A
- 3) Total duration of excess emissions X (100) / Total source operating time: N/A %

CMS Performance Summary:

- 1) CMS downtime in reporting period due to (reported in minutes; does not count preventative maintenance time):
 - a) Monitor equipment malfunctions: 0
 - b) Non-Monitor equipment malfunctions: 0
 - c) Quality assurance calibration: 960
 - d) Other known causes: 13
 - e) Unknown causes: 0
- 2) Total CMS Downtime: 973
- 3) Total duration of downtime X (100) / Total source operating time: 0.77%

Total Hydrocarbon Summary
Deviation = > 10 ppmv

The HWC MACT (40 CFR Part 63, Subpart EEE) allows facilities the option of choosing to maintain compliance by monitoring either Total Hydrocarbon or Carbon Monoxide emissions. Heritage-WTI has chosen to option of monitoring Total Hydrocarbons. The following table shows a summary of Total Hydrocarbon exceedances and total emissions for the quarter.

Date	MAXIMUM PPM	Duration (min)	Reason	Corrective Action
07/01/2011 06:37	12.1	39	Operator Error - Poor Feed Mix	Restarted unit. Reduced feed rate.
07/04/2011 08:32	12.0	59	Malfunction - Combustion Anomaly	Reviewed waste feeds. Restarted unit.
07/09/2011 19:46	15.7	28	Malfunction - Combustion Enhancement Equip.	Restarted unit. Adjusted lance. Revised inspection.
07/10/2011 11:43	15.6	59	Malfunction - Combustion Enhancement Equip.	Restarted unit. Adjusted lance. Revised inspection.
07/10/2011 13:56	14.4	59	Malfunction - Combustion Enhancement Equip.	Restarted unit. Adjusted lance. Revised inspection.
07/10/2011 17:38	12.5	23	Malfunction - Combustion Enhancement Equip.	Restarted unit. Adjusted lance. Revised inspection.
07/10/2011 23:00	10.9	15	Malfunction - Combustion Enhancement Equip.	Restarted unit. Adjusted lance. Revised inspection.
07/11/2011 09:17	12.7	54	Malfunction - Combustion Enhancement Equip.	Restarted unit. Adjusted lance. Revised inspection.
07/11/2011 14:25	17.3	59	Malfunction - Combustion Enhancement Equip.	Restarted unit. Adjusted lance. Revised inspection.
07/11/2011 18:26	15.7	55	Malfunction - Combustion Enhancement Equip.	Restarted unit. Adjusted lance. Revised inspection.
07/11/2011 20:18	12.7	54	Malfunction - Combustion Enhancement Equip.	Restarted unit. Adjusted lance. Revised inspection.
07/14/2011 11:54	13.8	49	Operator Error - Feed Prep	Reduced charge size and restarted unit.
07/14/2011 19:35	19.6	60	Malfunction - Combustion Anomaly	Reviewed waste feeds. Restarted unit.
07/14/2011 23:45	12.4	55	Malfunction - Customer Packaging Error	Contacted customer. Restarted unit.
07/24/2011 08:49	11.5	28	Malfunction - Combustion Anomaly	Reviewed waste feeds. Restarted unit.
07/25/2011 01:07	10.9	45	Operator Error - Feed Mix	Removed waste stream. Restarted unit.
07/26/2011 04:07	11.6	21	Malfunction - Lance Slagging	Restarted unit. Cleaned lances 7/26.
07/28/2011 09:34	16.4	59	Malfunction - Combustion Anomaly	Reviewed waste feeds. Restarted unit.
07/30/2011 06:38	11.0	57	Malfunction - Lance Purge	Cleared lance. Restarted unit.
07/31/2011 14:53	10.0	5	Malfunction - Lance Slagging	Cleaned lances 8/2. Restarted unit.
08/01/2011 22:56	10.8	24	Operator Error - Feed Prep	Reduced charge size. Restarted unit.
08/02/2011 03:26	13.3	38	Malfunction - Lance Slagging	Cleaned lances 8/2. Restarted unit.
08/05/2011 05:56	13.3	58	Malfunction - Lance Purge	Restarted unit.
08/10/2011 01:32	11.3	8	Operator Error- Feed Error	Restarted unit.
08/10/2011 04:05	14.3	59	Operator Error- Feed Prep	Reduced charge size. Restarted unit.
08/10/2011 12:54	17.9	60	Operator Error- Feed Prep	Reduced charge size. Restarted unit.
08/11/2011 23:55	19.3	60	Operator Error- Feed Prep	Reduced charge size. Restarted unit.
08/17/2011 12:30	18.8	60	Operator Error- Feed Prep	Reduced charge size. Restarted unit.
08/17/2011 16:02	10.9	19	Operator Error- Feed Prep	Solidified material. Restarted unit.
08/17/2011 16:23	10.7	14	Malfunction - Prior WFCO	Restarted unit.
08/21/2011 03:25	12.9	59	Operator Error- Feed Prep	Reduced charge size. Restarted unit.
08/22/2011 11:21	32.2	63	Operator Error- Feed Prep	Reduced charge size. Restarted unit.
08/22/2011 22:29	14.3	47	Operator Error- Feed Prep	Reduced charge size. Restarted unit.

Date	MAXIMUM PPM	Duration (min)	Reason	Corrective Action
08/28/2011 14:11	13.2	38	Malfunction - Lance Purge	Cleared line. Restarted unit.
09/05/2011 08:03	10.0	1	Operator Error - Poor Operation	Restarted unit. Reduced flows.
09/05/2011 08:56	10.4	1	Operator Error - Poor Operation	Restarted unit. Reduced flows.
09/05/2011 12:49	10.8	10	Malfunction - Combustion Anomaly	Reviewed waste feeds. Restarted unit.
09/09/2011 18:33	11.5	58	Malfunction - Customer Packaging Error	Restarted unit. Contacted customer.
09/11/2011 11:20	11.7	42	Malfunction - Front Wall Punch	Restarted unit. Check punch logic.
09/11/2011 21:38	10.4	11	Malfunction - Combustion Anomaly	Reviewed waste feeds. Restarted unit.
09/16/2011 14:52	11.3	43	Malfunction - Lance Slagging	Pressure washed lances. Restarted unit.
09/26/2011 16:43	11.7	42	Malfunction - Combustion Anomaly	Reviewed waste feeds. Restarted unit.
09/30/2011 22:18	17.8	60	Malfunction - Lance Purge	Restarted unit. Cleared line.
		1758	Total Minutes	
THC on Fuels				
07/08/2011 15:46	36.8	222	Startup - Maintenance Outage	Adjusted burner
07/21/2011 16:56	21.6	13	Shutdown - Maintenance	Adjusted burner
08/18/2011 08:00	25.6	1294	Shutdown - Maintenance	Adjusted burner
		1529	Total Minutes	

Total Hydrocarbon

Emission Data Summary:

1) Duration of excess emission in reporting period due to (all reported in minutes; excludes monitor downtime events):

- a) Startup / shutdown: 1529
- b) Control equipment problems: 406
- c) Process Problems: 320
- d) Other known causes: 763
- e) Unknown causes: 269

2) Total duration of excess emissions: 3,287

3) Total duration of excess emissions X (100) / Total source operating time: 2.59%

CMS Performance Summary:

1) CMS downtime in reporting period due to (reported in minutes; does not count preventative maintenance time):

- a) Monitor equipment malfunctions: 0
- b) Non-Monitor equipment malfunctions: 0
- c) Quality assurance calibration: 0
- d) Other known causes: 0
- e) Unknown causes: 0

2) Total CMS Downtime: 0

3) Total duration of downtime X (100) / Total source operating time: 0.00%

B. Malfunctions

As historically required by former terms and conditions, WTI has included all monitor quality assurance, preventative maintenance, and downtime in the exceedance section of the Excess Emissions Report (EER) for all N001 monitors. Malfunctions of the monitor would be reported in the downtime section of the EER. This EER is submitted separate from this Title V report.

End of Report



HERITAGE-WTI, INC.
1250 St. George Street
East Liverpool, Ohio 43920-3400
Phone: 330-385-7337
Fax: 330-385-7813
Web Site: www.heritage-wti.com

OHSAS 18001: 2007
ISO 14001: 2004
ISO 9001: 2008

Mr. Eric Bewley
Division of Air Pollution Control
Northeast District Office
2110 East Aurora Road
Twinsburg, Ohio 44087

January 31, 2012
VIA AIR SERVICES

RE: HERITAGE-WTI, INC
QUARTERLY TITLE V REPORT
FACILITY ID 02-15-02-0233
4th Quarter 2011

Dear Mr. Bewley:

Enclosed is Heritage-WTI, Inc's Quarterly Title V Report required by Section A(c)(ii) of WTI's Title V permit. This report covers the quarterly time period from **October 1, 2011 through December 31, 2011.**

This report reflects monitoring and reporting requirements outlined in the facility Permits to Install 02-18743 and 02-20067 as well as the Heritage-WTI Title V Permit #P0084372. Please note that the installation of emissions unit P006 has not been completed and will not be completed as described in Permit to Install #P0103856. As a result, Heritage-WTI allowed this PTI to expire on March 25, 2010. It is no longer included in this report.

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are certain penalties for submitting false information including the possibility of fine and imprisonment for knowing violations."

As always if you have any questions and/or comments feel free to contact me, or Vince Waggle, at 330-385-7337.

Sincerely,

A handwritten signature in black ink, appearing to read 'Frank Murray', written over a horizontal line.

Frank Murray
General Manager
Heritage-WTI, Inc.



Recycled Paper

Enclosure

2011
4th QUARTER
TITLE V REPORT

FOR

HERITAGE-WTI, INC

January 31, 2012

Section I – General Information

A. Facility Information

Facility ID:	02-15-02-0233
Responsible Official's Name / Title:	Frank Murray General Manager
Street Address:	1250 Saint George Street
City:	East Liverpool
State:	Ohio
Zip Code:	43920
Facility Name:	Heritage-WTI, Inc
Facility Local Contact Name:	Local contact is the same information as given above.

B. Relevant standard(s) or other requirement(s) that is/are the basis for this report:

OAC rule 3745-77-07(A)(3) – Monitoring and related recordkeeping and reporting requirements

C. Are you requesting a waiver of recordkeeping and/or reporting requirements under the applicable relevant standard(s) in conjunction with this report?

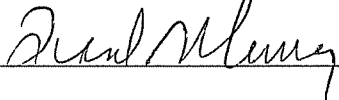
☐ Yes ☒ No

If you answered yes, you must submit the application for a waiver of recordkeeping and/or reporting requirements together with this report. The application for waiver should include whatever information you consider useful to convince the Administrator that a waiver of recordkeeping or recording is warranted. (63.10(f)(3))

Section II – Certification

Based upon information and belief formed after a reasonable inquiry, I as a responsible official of the above-mentioned facility, certify the information contained in this report is accurate and true to the best of my knowledge.

Frank Murray, General Manager

Signature: 

Date: 1/30/2012

Section III – Title V Permit Quarterly Reporting Requirements

A. Deviation Reporting

Emission units **F001** (Paved and Unpaved Roadways and Parking Areas), **F002** (Loose Solid Waste Receiving and Handling), **F004** (Pneumatic Lime and Activated Charcoal Handling System), and **N001** (Hazardous Waste Incinerator), **P001** (Container Processing) **P003** (Tanker Transfer Station – Bay 2), **P004** (Tanker Transfer Station – Bay 3), and **P005** (Direct Tanker Transfer Station –East Bay) have quarterly deviation reporting requirements as defined by Heritage-WTI's Title V Permit # P0084372.

Emission unit **B006** requires deviation reports to be sent to OEPA- NEDO within 30 days of becoming aware of an occurrence.

F001 Reporting Requirements:

- a. Each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and*

There were no occurrences to report as defined by the reporting requirements for this unit.

- b. Each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.*

There were no occurrences to report as defined by the reporting requirements for this unit.

F002 Reporting Requirements:

- a. Any time when the vapor recovery system was not in operation when waste was processed within this emissions unit;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- b. Any time when emissions in the vapor recovery system were not vented to either the incinerator and/or the carbon adsorption system when waste was processed within this emissions unit;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- c. *Any record indicating the pressure within the vapor recovery system upstream from the ventilation header blower was at or above atmospheric pressure when waste was processed within this emissions unit;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- d. *Any record indicating detectable emissions from the vapor recovery system or from any equipment component of this emissions unit;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- e. *An identification of the days when cracks, openings, broken seals, or any other condition allowing outward flow from the emissions unit were discovered by the daily inspection of the overhead doors and/or enclosure and a description of the corrective action, and when it was performed; and*

There were no occurrences to report as defined by the reporting requirements for this unit.

- f. *An identification of the days during which visible emissions of fugitive dust were observed when the overhead doors were opened and a description of any corrective actions taken, if any, to minimize or eliminate the visible emissions.*

There were no occurrences to report as defined by the reporting requirements for this unit.

F003 Reporting Requirements:

- a. *Each day when the enclosures were not found to be in good operating condition and the corrective actions taken; and*

There were no occurrences to report as defined by the reporting requirements for this unit.

- b. *Each day or week during which any fugitive visible emission were observed and the corrective actions taken.*

There were no occurrences to report as defined by the reporting requirements for this unit.

F004 Reporting Requirements:

- a. *The period of time when the pressure drop across the bag house on the lime silo stack was outside the range specified in section A.III.1;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- b. *Each day when the enclosures were not found to be in good operating condition and the corrective actions taken; and*

There were no occurrences to report as defined by the reporting requirements for this unit.

- c. *Each day or week during which any fugitive visible emission were observed and the corrective actions taken.*

There were no occurrences to report as defined by the reporting requirements for this unit.

P001 Reporting Requirements:

- a. *Any time when the vapor recovery system was not in operation when waste was processed within this emissions unit;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- b. *Any time when emissions in the vapor recovery system were not vented to either the incinerator and/or the carbon adsorption system when waste was processed within this emissions unit;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- c. *Any record indicating the pressure within the vapor recovery system upstream from the ventilation header blower was at or above atmospheric pressure when waste was processed within this emissions unit;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- d. Any record indicating detectable emissions from the vapor recovery system, cover and/ or opening of any container, and/ or any equipment component of this emissions unit;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- e. Each day or week during which any visible emissions were observed and the corrective actions taken.*

12/17/2011 - at approximately 1:00 p.m., a drum containing non-ferrous metal fines ignited and caught fire in the Drum Processing Building (DPB). This material in this container was being repackaged into smaller charges in preparation for incineration. The container involved in this incident contained various metals including zirconium, hafnium, and titanium in varying concentrations. The total weight of the container and the material involved was 934 pounds. All materials in the container as well as some nearby materials were consumed by the fire. Vapors emitted from incident were exhausted from the DPB through the building ventilation and vapor recovery systems. Less than 1000 pounds of material was involved in the incident. It is not likely that there was an impact on human health or the environment due to the inorganic nature of the material.

P003 – P005 Reporting Requirements:

The emissions units have the same reporting requirements and therefore will be combined for the purpose of this report. The specific emission unit will be identified, if necessary, in the contents of this section.

- f. Each day when the number of gallons loaded exceeded 44,000 gallons;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- g. Each day when the calculated loading loss value exceeded 41.9 pounds per 1,000 gallons;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- h. Any time when the vapor recovery system was not in operation when waste was processed within this emissions unit;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- i. Any time when emissions in the vapor recovery system were not vented to either the incinerator and/or the carbon adsorption system when waste was processed within this emissions unit;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- j. Any record indicating the pressure within the vapor recovery system upstream from the ventilation header blower was at or above atmospheric pressure when waste was processed within this emissions unit;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- k. Each day when loading occurred without submerged fill;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- l. Any record indicating detectable emissions from the vapor recovery system or from any equipment component of this emissions unit;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- m. Any record indicating the loading and unloading activities occurred at the same time within this emissions unit.*

There were no occurrences to report as defined by the reporting requirements for this unit.

N001 Reporting Requirements:

Heritage-WTI is required to submit quarterly reports documenting exceedances of emissions limitations and other operating parameters specified by the Title V Permit #P0084372. In addition, the permit also specifies that Heritage-WTI provide quarterly reports on the performance of the Continuous Monitoring System (CMS).

This Title V Quarterly Report will only contain a summary of the quarter's exceedances and CMS downtime. A more detailed report will be submitted to OEPA under a separated cover letter titled **4th Quarter Excess Emissions Report**. An additional report titled **4th Quarter Data Assessment Report** will be sent detailing the results of the periodic Cylinder Gas Audits and Relative Accuracy Test Audits.

Temperature Deviation Summary

Heritage-WTI maintains two temperature Operating Parameter Limits in accordance 40 CFR Part 63, Subpart EEE. Temperature limits for the Rotary Kiln and Secondary Combustion Chamber are necessary maintain the temperature needed to meet the Destruction Removal Efficiency and Dioxin/Furan emission standards established under the HWC MACT.

Kiln Temp Summary

Deviation = < 1718 F 1-hr avg.

Date	MINIMUM TEMP DEG F	Duration (min)	Reason	Corrective Action
		0	Total Minutes	

SCC Temp Summary

Deviation = <1747 F 1-hr avg.

Date	MINIMUM TEMP DEG F	Duration (min)	Reason	Corrective Action
		0	Total Minutes	

Opacity Summary
 Deviation => 20% on 6 min. avg.

Date	MAXIMUM OPACITY	Duration (min)	Reason	Corrective Action
10/01/2011 20:42	53.2	6	Feed - Drum	Start Pink Plume Suppression
10/03/2011 01:24	24.2	6	Feed - Drum	Start Pink Plume Suppression
11/02/2011 13:24	38.5	36	Quarterly Stack Audit	Complete Testing
		12	Total Minutes	

Opacity

Emission Data Summary:

1) Duration of excess emission in reporting period due to (all reported in minutes; excludes monitor downtime events):

- a) Startup / shutdown: 0
- b) Control equipment problems: 0
- c) Process Problems: 0
- d) Other known causes: 48
- e) Unknown causes: 0

2) Total duration of excess emissions: 48

3) Total duration of excess emissions X (100) / Total source operating time: 0.04%

CMS Performance Summary:

1) CMS downtime in reporting period due to (reported in minutes; does not count preventative maintenance time):

- a) Monitor equipment malfunctions: 0
- b) Non-Monitor equipment malfunctions: 0
- c) Quality assurance calibration: 637
- d) Other known causes: 0
- e) Unknown causes: 0

2) Total CMS Downtime: 637

3) Total duration of downtime X (100) / Total source operating time: 0.50%

Sulfur Dioxide Summary

Deviation =>11.34 lbs/hr
 49.69 tons/year

Date	MAXIMUM LB/MMBTU	Duration (min)	Reason	Corrective Action
11/21/2011 16:55	12.0	14	Start Up - Refractory Outage	Added Caustic to 3rd Stage
		14	Total Minutes	

Sulfur Dioxide

Emission Data Summary:

- 1) Duration of excess emission in reporting period due to (all reported in minutes; excludes monitor downtime events):
 - a) Startup / shutdown: 14
 - b) Control equipment problems: 0
 - c) Process Problems: 0
 - d) Other known causes: 0
 - e) Unknown causes: 0
- 2) Total duration of excess emissions: 0
- 3) Total duration of excess emissions X (100) / Total source operating time: 0.01%

CMS Performance Summary:

- 1) CMS downtime in reporting period due to (reported in minutes; does not count preventative maintenance time):
 - a) Monitor equipment malfunctions: 0
 - b) Non-Monitor equipment malfunctions: 0
 - c) Quality assurance calibration: 1,978
 - d) Other known causes: 65
 - e) Unknown causes: 0
- 2) Total CMS Downtime: 2,043
- 3) Total duration of downtime X (100) / Total source operating time: 1.61

Nitrogen Oxides Summary

Deviation= >28.36 lbs/hr
 124.23 Tons/year

Date	MAXIMUM LB/HR	Duration (min)	Reason	Corrective Action
10/04/2011 19:05	34.1	139	Feed - Drum	Reduced Feed Rates
10/17/2011 07:49	31.9	26	Feed - Drum	Reduced Feed Rates
10/23/2011 12:31	29.7	17	Feed - Drum	Reduced Feed Rates
10/23/2011 14:13	30.1	9	Feed - Drum	Reduced Feed Rates
11/02/2011 16:57	28.6	7	Feed - Drum	Reduced Feed Rates
11/29/2011 01:19	30.1	23	Feed - Drum	Reduced Feed Rates
11/29/2011 20:48	28.6	7	Feed - Drum	Reduced Feed Rates
11/29/2011 21:03	28.4	3	Feed - Drum	Reduced Feed Rates
12/01/2011 12:39	31.3	26	Feed - Drum	Reduced Feed Rates
12/28/2011 22:58	28.6	17	Feed - Drum	Reduced Feed Rates
		274	Total Minutes	

Nitrogen Oxide

Emission Data Summary:

1) Duration of excess emission in reporting period due to (all reported in minutes; excludes monitor downtime events):

- a) Startup / shutdown: 0
- b) Control equipment problems: 0
- c) Process Problems: 0
- d) Other known causes: 274
- e) Unknown causes: 0

2) Total duration of excess emissions: 274

3) Total duration of excess emissions X (100) / Total source operating time: 0.22%

CMS Performance Summary:

1) CMS downtime in reporting period due to (reported in minutes; does not count preventative maintenance time):

- a) Monitor equipment malfunctions: 0
- b) Non-Monitor equipment malfunctions: 0
- c) Quality assurance calibration: 1,962
- d) Other known causes: 22
- e) Unknown causes: 0

2) Total CMS Downtime: 1,984

3) Total duration of downtime X (100) / Total source operating time: 1.56%

Carbon Monoxide Summary

Deviation = N/A

The HWC MACT (40 CFR Part 63, Subpart EEE) allows facilities the option of choosing to maintain compliance by monitoring either Total Hydrocarbon or Carbon Monoxide emissions. Heritage-WTI has chosen to option of monitoring Total Hydrocarbons. As a result, the facility does not have a short term emission limitation on Carbon Monoxide. The following table shows a summary of Carbon Monoxide emissions for the quarter.

Date	Time	Lb/MMBtu	Incinerator Operation
Total CO emissions for the quarter:			
		lbs	tons
		12313	6.16

Carbon Monoxide

Emission Data Summary:

- 1) Duration of excess emission in reporting period due to (all reported in minutes; excludes monitor downtime events):
 - a) Startup / shutdown: N/A
 - b) Control equipment problems: N/A
 - c) Process Problems: N/A
 - d) Other known causes: N/A
 - e) Unknown causes: N/A
- 2) Total duration of excess emissions: N/A
- 3) Total duration of excess emissions X (100) / Total source operating time: N/A %

CMS Performance Summary:

- 1) CMS downtime in reporting period due to (reported in minutes; does not count preventative maintenance time):
 - a) Monitor equipment malfunctions: 0
 - b) Non-Monitor equipment malfunctions: 0
 - c) Quality assurance calibration: 941
 - d) Other known causes: 10
 - e) Unknown causes: 0
- 2) Total CMS Downtime: 951
- 3) Total duration of downtime X (100) / Total source operating time: 0.75%

Total Hydrocarbon Summary

Deviation => 10 ppmv

The HWC MACT (40 CFR Part 63, Subpart EEE) allows facilities the option of choosing to maintain compliance by monitoring either Total Hydrocarbon or Carbon Monoxide emissions. Heritage-WTI has chosen to option of monitoring Total Hydrocarbons. The following table shows a summary of Total Hydrocarbon exceedances and total emissions for the quarter.

Date	MAXIMUM PPM	Duration (min)	Reason	Cause Description	Corrective Action
Waste					
10/07/2011 23:33	11.1	41	Operator Error - Feed Prep	Improper feed prep led to por combustion and THC.	Reduced charges. Restarted unit.
10/16/2011 18:02	14.2	59	Operator Error - Feed Prep	Improper feed prep led to por combustion and THC.	Reduced charges. Restarted unit.
10/31/2011 02:05	10.5	53	Operator Error - Feed Prep	Improper feed prep led to por combustion and THC.	Reduced charges. Restarted unit.
11/05/2011 18:25	19.1	57	Malfunction - Lance Purging	Automatic purging of sludge lance caused THC event.	Cleared lance. Restarted unit.
11/06/2011 00:57	11.0	57	Operator Error - Feed Prep	Improper feed prep led to por combustion and THC.	Spread out charges. Restarted unit.
11/22/2011 12:15	12.1	49	Operator Error - Feed Prep	Improper feed prep led to por combustion and THC.	Reduced charges. Restarted unit.
11/22/2011 17:49	11.6	26	Malfunction - Combustion Anomaly	Unexpected and unpreventable combustion upset caused THC.	Reviewed waste feeds. Restarted unit.
11/23/2011 04:47	10.2	4	Malfunction - Combustion Anomaly	Unexpected and unpreventable combustion upset caused THC.	Reviewed waste feeds. Restarted unit.
12/01/2011 15:10	11.7	30	Malfunction - Clinker Fell	Ash fall from SCC into quench caused combustion upset.	Restarted unit.
12/07/2011 20:23	12.1	33	Malfunction - Emergency Reponse	Emergency incineration of reacting materials led to THC event.	Restarted unit.
12/13/2011 19:27	18.4	60	Operator Error - Feed mix	Poor feed mix caused THC exceedance.	Spread out waste stream. Restart unit.
		469	Total Minutes		
Fuels					
10/27/2011 07:21	13.5	38	Start Up - Scrubber Maintenance	Gas burner fuel /air ratio not optimal.	Adjusted burner.
11/20/2011 19:33	249.6	357	Start Up - Refractory Outage	Gas burner fuel /air ratio not optimal.	Adjusted burner.
		395	Total Minutes		
		0	Total Minutes in Exceedance		
		11	Number of Events		
			Total Emissions for the Quarter		
		374	(LBS)		
		0.19	(Tons)		

Total Hydrocarbon Emission Data Summary:

1) Duration of excess emission in reporting period due to (all reported in minutes; excludes monitor downtime events):

- | | |
|--------------------------------|-----|
| a) Startup / shutdown: | 395 |
| b) Control equipment problems: | 0 |
| c) Process Problems: | 87 |
| d) Other known causes: | 352 |
| e) Unknown causes: | 30 |

- | | |
|--|-------|
| 2) Total duration of excess emissions: | 864 |
| 3) Total duration of excess emissions X (100) / Total source operating time: | 0.68% |

CMS Performance Summary:

1) CMS downtime in reporting period due to (reported in minutes; does not count preventative maintenance time):

- | | |
|--|-------|
| a) Monitor equipment malfunctions: | 0 |
| b) Non-Monitor equipment malfunctions: | 0 |
| c) Quality assurance calibration: | 0 |
| d) Other known causes: | 0 |
| e) Unknown causes: | 0 |
| 2) Total CMS Downtime: | 0 |
| 3) Total duration of downtime X (100) / Total source operating time: | 0.00% |

B. Malfunctions

As historically required by former terms and conditions, WTI has included all monitor quality assurance, preventative maintenance, and downtime in the exceedance section of the Excess Emissions Report (EER) for all N001 monitors. Malfunctions of the monitor would be reported in the downtime section of the EER. This EER is submitted separate from this Title V report.

End of Report

Bcc: Env. Department

ECF: Air Quarterly Reporting / Title V Permit / Deviation Report

FILE NAME: environ/vince/Title V quarterly and Semi/114Q/T5 q rep114Q.doc



HERITAGE-WTI, INC.
1250 St. George Street
East Liverpool, Ohio 43920-3400
Phone: 330-385-7337
Fax: 330-385-7813
Web Site: www.heritage-wti.com

OHSAS 18001: 2007
ISO 14001: 2004
ISO 9001: 2008

Mr. Eric Bewley
Division of Air Pollution Control
Northeast District Office
2110 East Aurora Road
Twinsburg, Ohio 44087

April 30, 2012
VIA AIR SERVICES

RE: HERITAGE-WTI, INC
QUARTERLY TITLE V REPORT
FACILITY ID 02-15-02-0233
1st Quarter 2012

Dear Mr. Bewley:

Enclosed is Heritage-WTI, Inc.'s Quarterly Title V Report required by Section A(c)(ii) of WTI's Title V permit. This report covers the quarterly time period from **January 1, 2012 through March 31, 2012.**

This report reflects monitoring and reporting requirements outlined in the facility Permits to Install 02-18743 and 02-20067 as well as the Heritage-WTI Title V Permit #P0084372. Please note that the installation of emissions unit P006 has not been completed and will not be completed as described in Permit to Install #P0103856. As a result, Heritage-WTI allowed this PTI to expire on March 25, 2010. It is no longer included in this report.

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are certain penalties for submitting false information including the possibility of fine and imprisonment for knowing violations."

As always if you have any questions and/or comments feel free to contact me, or Vince Waggle, at 330-385-7337.

Sincerely,

A handwritten signature in dark ink, appearing to read "Frank Murray", written in a cursive style.

Frank Murray
General Manager
Heritage-WTI, Inc.



Recycled Paper

Enclosure

2012
1st QUARTER
TITLE V REPORT
FOR
HERITAGE-WTI, INC
April 30, 2012

Section I – General Information

A. Facility Information

Facility ID:	02-15-02-0233
Responsible Official's Name / Title:	Frank Murray General Manager
Street Address:	1250 Saint George Street
City:	East Liverpool
State:	Ohio
Zip Code:	43920
Facility Name:	Heritage-WTI, Inc
Facility Local Contact Name:	Local contact is the same information as given above.

B. Relevant standard(s) or other requirement(s) that is/are the basis for this report:

OAC rule 3745-77-07(A)(3) – Monitoring and related recordkeeping and reporting requirements

C. Are you requesting a waiver of recordkeeping and/or reporting requirements under the applicable relevant standard(s) in conjunction with this report?

☐ Yes ☒ No

If you answered yes, you must submit the application for a waiver of recordkeeping and/or reporting requirements together with this report. The application for waiver should include whatever information you consider useful to convince the Administrator that a waiver of recordkeeping or recording is warranted. (63.10(f)(3))

Section II – Certification

Based upon information and belief formed after a reasonable inquiry, I as a responsible official of the above-mentioned facility, certify the information contained in this report is accurate and true to the best of my knowledge.

Frank Murray, General Manager

Signature: _____

Date: 4/16/12

Section III – Title V Permit Quarterly Reporting Requirements

A. Deviation Reporting

Emission units **F001** (Paved and Unpaved Roadways and Parking Areas), **F002** (Loose Solid Waste Receiving and Handling), **F004** (Pneumatic Lime and Activated Charcoal Handling System), and **N001** (Hazardous Waste Incinerator), **P001** (Container Processing) **P003** (Tanker Transfer Station – Bay 2), **P004** (Tanker Transfer Station – Bay 3), and **P005** (Direct Tanker Transfer Station –East Bay) have quarterly deviation reporting requirements as defined by Heritage-WTI's Title V Permit # P0084372.

Emission unit **B006** requires deviation reports to be sent to OEPA- NEDO within 30 days of becoming aware of an occurrence.

F001 Reporting Requirements:

- a. *Each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and*

There were no occurrences to report as defined by the reporting requirements for this unit.

- b. *Each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.*

There were no occurrences to report as defined by the reporting requirements for this unit.

F002 Reporting Requirements:

- a. *Any time when the vapor recovery system was not in operation when waste was processed within this emissions unit;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- b. *Any time when emissions in the vapor recovery system were not vented to either the incinerator and/or the carbon adsorption system when waste was processed within this emissions unit;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- c. *Any record indicating the pressure within the vapor recovery system upstream from the ventilation header blower was at or above atmospheric pressure when waste was processed within this emissions unit;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- d. *Any record indicating detectable emissions from the vapor recovery system or from any equipment component of this emissions unit;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- e. *An identification of the days when cracks, openings, broken seals, or any other condition allowing outward flow from the emissions unit were discovered by the daily inspection of the overhead doors and/or enclosure and a description of the corrective action, and when it was performed; and*

There were no occurrences to report as defined by the reporting requirements for this unit.

- f. *An identification of the days during which visible emissions of fugitive dust were observed when the overhead doors were opened and a description of any corrective actions taken, if any, to minimize or eliminate the visible emissions.*

There were no occurrences to report as defined by the reporting requirements for this unit.

F003 Reporting Requirements:

- a. *Each day when the enclosures were not found to be in good operating condition and the corrective actions taken; and*

There were no occurrences to report as defined by the reporting requirements for this unit.

- b. *Each day or week during which any fugitive visible emission were observed and the corrective actions taken.*

There were no occurrences to report as defined by the reporting requirements for this unit.

F004 Reporting Requirements:

- a. *The period of time when the pressure drop across the bag house on the lime silo stack was outside the range specified in section A.III.1;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- b. *Each day when the enclosures were not found to be in good operating condition and the corrective actions taken; and*

There were no occurrences to report as defined by the reporting requirements for this unit.

- c. *Each day or week during which any fugitive visible emission were observed and the corrective actions taken.*

There were no occurrences to report as defined by the reporting requirements for this unit.

P001 Reporting Requirements:

- a. *Any time when the vapor recovery system was not in operation when waste was processed within this emissions unit;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- b. *Any time when emissions in the vapor recovery system were not vented to either the incinerator and/or the carbon adsorption system when waste was processed within this emissions unit;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- c. *Any record indicating the pressure within the vapor recovery system upstream from the ventilation header blower was at or above atmospheric pressure when waste was processed within this emissions unit;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- d. Any record indicating detectable emissions from the vapor recovery system, cover and/ or opening of any container, and/ or any equipment component of this emissions unit;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- e. Each day or week during which any visible emissions were observed and the corrective actions taken.*

There were no occurrences to report as defined by the reporting requirements for this unit.

P003 – P005 Reporting Requirements:

The emissions units have the same reporting requirements and therefore will be combined for the purpose of this report. The specific emission unit will be identified, if necessary, in the contents of this section.

- f. Each day when the number of gallons loaded exceeded 44,000 gallons;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- g. Each day when the calculated loading loss value exceeded 41.9 pounds per 1,000 gallons;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- h. Any time when the vapor recovery system was not in operation when waste was processed within this emissions unit;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- i. Any time when emissions in the vapor recovery system were not vented to either the incinerator and/or the carbon adsorption system when waste was processed within this emissions unit;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- j. *Any record indicating the pressure within the vapor recovery system upstream from the ventilation header blower was at or above atmospheric pressure when waste was processed within this emissions unit;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- k. *Each day when loading occurred without submerged fill;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- l. *Any record indicating detectable emissions from the vapor recovery system or from any equipment component of this emissions unit;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- m. *Any record indicating the loading and unloading activities occurred at the same time within this emissions unit.*

There were no occurrences to report as defined by the reporting requirements for this unit.

N001 Reporting Requirements:

Heritage-WTI is required to submit quarterly reports documenting exceedances of emissions limitations and other operating parameters specified by the Title V Permit #P0084372. In addition, the permit also specifies that Heritage-WTI provide quarterly reports on the performance of the Continuous Monitoring System (CMS).

This Title V Quarterly Report will only contain a summary of the quarter's exceedances and CMS downtime. A more detailed report will be submitted to OEPA under a separated cover letter titled **4th Quarter Excess Emissions Report**. An additional report titled **4th Quarter Data Assessment Report** will be sent detailing the results of the periodic Cylinder Gas Audits and Relative Accuracy Test Audits.

Temperature Deviation Summary

Heritage-WTI maintains two temperature Operating Parameter Limits in accordance 40 CFR Part 63, Subpart EEE. Temperature limits for the Rotary Kiln and Secondary Combustion Chamber are necessary maintain the temperature needed to meet the Destruction Removal Efficiency and Dioxin/Furan emission standards established under the HWC MACT.

Kiln Temp Summary

Deviation = < 1718 F 1-hr avg.

Date	MINIMUM TEMP DEG F	Duration (min)	Reason	Corrective Action
01/31/2012 03:17	1103.2	82	Malfunction - Prior AWFCO (Clinker)	Restarted unit and regained temperature.
02/28/2012 06:44	1676.5	43	Malfunction - Instrument	Replaced controller. WO# 120973. Restarted unit.
03/24/2012 04:19	1144.7	64	Malfunction - Ring Jets	Repaired ring jets. Restarted unit.
		189	Total Minutes	

SCC Temp Summary

Deviation = <1747 F 1-hr avg.

Date	MINIMUM TEMP DEG F	Duration (min)	Reason	Corrective Action
01/31/2012 03:18	1072.1	85	Malfunction - Prior AWFCO (Clinker)	Restarted unit and regained temperature.
02/28/2012 06:34	1585.2	76	Malfunction - Instrument	Replaced controller. WO# 120973. Restarted unit.
03/24/2012 04:14	934.5	69	Malfunction - Ring Jets	Repaired ring jets. Restarted unit.
		230	Total Minutes	

Opacity Summary
Deviation => 20% on 6 min. avg.

Date	MAXIMUM OPACITY	Duration (min)	Reason	Corrective Action
01/05/2012 05:24	27.7	6	Feed - Drum	Reduced Feed Rates
01/11/2012 09:12	22.84	12	Quarterly Stack Audit	Complete Testing
01/11/2012 09:48	40.57	12	Quarterly Stack Audit	Complete Testing
01/13/2012 06:54	27.2	6	Feed - Drum	Reduced Feed Rates
01/14/2012 21:12	35.8	6	Feed - Drum	Reduced Feed Rates
02/06/2012 06:06	33.8	6	Feed - Drum	Reduced Feed Rates
02/10/2012 06:42	34.8	6	Feed - Drum	Reduced Feed Rates
02/10/2012 19:12	26.3	6	Feed - Drum	Reduced Feed Rates
03/23/2012 12:42	85.8	24	Malfunction - Ring Jets	Repaired ring jets.
03/23/2012 13:24	22.1	6	Malfunction - Ring Jets	Repaired ring jets.
		90	Total Minutes	

Opacity

Emission Data Summary:

- 1) Duration of excess emission in reporting period due to (all reported in minutes; excludes monitor downtime events):
 - a) Startup / shutdown: 0
 - b) Control equipment problems: 30
 - c) Process Problems: 0
 - d) Other known causes: 60
 - e) Unknown causes: 0
- 2) Total duration of excess emissions: 90
- 3) Total duration of excess emissions X (100) / Total source operating time: 0.07%

CMS Performance Summary:

- 1) CMS downtime in reporting period due to (reported in minutes; does not count preventative maintenance time):
 - a) Monitor equipment malfunctions: 0
 - b) Non-Monitor equipment malfunctions: 0
 - c) Quality assurance calibration: 637
 - d) Other known causes: 0
 - e) Unknown causes: 0
- 2) Total CMS Downtime: 637
- 3) Total duration of downtime X (100) / Total source operating time: 0.51

Sulfur Dioxide Summary

Deviation = >11.34 lbs/hr
 49.69 tons/year

Date	MAXIMUM LB/MMBTU	Duration (min)	Reason	Corrective Action
01/03/2012 06:19	14.3	38	Feed - Drum	Reduced Feed Rates
01/03/2012 09:16	15.6	48	Feed - Drum	Reduced Feed Rates
01/13/2012 06:12	16.5	70	Feed - Drum	Reduced Feed Rates
02/06/2012 06:25	18.4	46	Feed - Drum	Reduced Feed Rates
02/10/2012 06:49	20.2	41	Feed - Drum	Reduced Feed Rates
02/17/2012 07:21	11.5	10	Feed - Drum	Reduced Feed Rates
02/24/2012 21:50	17.3	49	Feed - Lance	Reduced Feed Rates
03/16/2012 23:50	11.6	6	Feed - Drum	Reduced Feed Rates
03/23/2012 20:50	11.9	6	Feed - Drum	Reduced Feed Rates
		314	Total Minutes	

Sulfur Dioxide

Emission Data Summary:

- 1) Duration of excess emission in reporting period due to (all reported in minutes; excludes monitor downtime events):
 - a) Startup / shutdown: 0
 - b) Control equipment problems: 0
 - c) Process Problems: 0
 - d) Other known causes: 314
 - e) Unknown causes: 0
- 2) Total duration of excess emissions: 0
- 3) Total duration of excess emissions X (100) / Total source operating time: 0.25%

CMS Performance Summary:

- 1) CMS downtime in reporting period due to (reported in minutes; does not count preventative maintenance time):
 - a) Monitor equipment malfunctions: 0
 - b) Non-Monitor equipment malfunctions: 0
 - c) Quality assurance calibration: 1,953
 - d) Other known causes: 1,633
 - e) Unknown causes: 0
- 2) Total CMS Downtime: 3,586
- 3) Total duration of downtime X (100) / Total source operating time: 2.86

Nitrogen Oxides Summary

Deviation= >28.36 lbs/hr
124.23 Tons/year

Date	MAXIMUM LB/HR	Duration (min)	Reason	Corrective Action
01/14/2012 08:57	42.8	172	Feed - Lance	Adjusted Feed Rates
01/14/2012 12:45	44.2	349	Feed - Lance	Adjusted Feed Rates
02/10/2012 05:36	30.1	18	Feed - Drum	Adjusted Feed Rates
02/12/2012 12:23	33.8	116	Feed - Drum	Adjusted Feed Rates
02/20/2012 23:10	29.0	9	Feed - Drum	Adjusted Feed Rates
02/23/2012 10:16	28.6	13	Feed - Drum	Adjusted Feed Rates
03/04/2012 19:00	29.1	19	Feed - Drum	Adjusted Feed Rates
03/04/2012 19:22	28.5	4	Feed - Drum	Adjusted Feed Rates
03/06/2012 07:21	30.2	8	Feed - Drum	Adjusted Feed Rates
03/11/2012 13:21	28.4	1	Feed - Drum	Adjusted Feed Rates
03/13/2012 09:17	28.5	3	Feed - Drum	Adjusted Feed Rates
03/13/2012 09:27	28.7	9	Feed - Drum	Adjusted Feed Rates
03/16/2012 22:22	30.0	27	Feed - Drum	Adjusted Feed Rates
03/22/2012 17:24	28.5	3	Feed - Drum	Adjusted Feed Rates
03/22/2012 21:54	32.1	60	Feed - Drum	Adjusted Feed Rates
03/25/2012 06:49	28.5	3	Feed - Drum	Adjusted Feed Rates
		814	Total Minutes	

Nitrogen Oxide

Emission Data Summary:

1) Duration of excess emission in reporting period due to (all reported in minutes; excludes monitor downtime events):

- a) Startup / shutdown: 0
- b) Control equipment problems: 0
- c) Process Problems: 0
- d) Other known causes: 814
- e) Unknown causes: 0

2) Total duration of excess emissions: 274

3) Total duration of excess emissions X (100) / Total source operating time: 0.65%

CMS Performance Summary:

1) CMS downtime in reporting period due to (reported in minutes; does not count preventative maintenance time):

- a) Monitor equipment malfunctions: 0
- b) Non-Monitor equipment malfunctions: 0
- c) Quality assurance calibration: 1,953
- d) Other known causes: 1,639
- e) Unknown causes: 0

2) Total CMS Downtime: 3,592

3) Total duration of downtime X (100) / Total source operating time: 2.86%

Carbon Monoxide Summary

Deviation = N/A

The HWC MACT (40 CFR Part 63, Subpart EEE) allows facilities the option of choosing to maintain compliance by monitoring either Total Hydrocarbon or Carbon Monoxide emissions. Heritage-WTI has chosen to option of monitoring Total Hydrocarbons. As a result, the facility does not have a short term emission limitation on Carbon Monoxide. The following table shows a summary of Carbon Monoxide emissions for the quarter.

Date	Time	Lb/MMBtu	Incinerator Operation
Total CO emissions for the quarter:			
		lbs	tons
		9790	4.89

Carbon Monoxide

Emission Data Summary:

- 1) Duration of excess emission in reporting period due to (all reported in minutes; excludes monitor downtime events):
 - a) Startup / shutdown: N/A
 - b) Control equipment problems: N/A
 - c) Process Problems: N/A
 - d) Other known causes: N/A
 - e) Unknown causes: N/A
- 2) Total duration of excess emissions: N/A
- 3) Total duration of excess emissions X (100) / Total source operating time: N/A %

CMS Performance Summary:

- 1) CMS downtime in reporting period due to (reported in minutes; does not count preventative maintenance time):
 - a) Monitor equipment malfunctions: 0
 - b) Non-Monitor equipment malfunctions: 0
 - c) Quality assurance calibration: 960
 - d) Other known causes: 23
 - e) Unknown causes: 0
- 2) Total CMS Downtime: 983
- 3) Total duration of downtime X (100) / Total source operating time: 0.78%

Total Hydrocarbon Summary

Deviation => 10 ppmv

The HWC MACT (40 CFR Part 63, Subpart EEE) allows facilities the option of choosing to maintain compliance by monitoring either Total Hydrocarbon or Carbon Monoxide emissions. Heritage-WTI has chosen to option of monitoring Total Hydrocarbons. The following table shows a summary of Total Hydrocarbon exceedances and total emissions for the quarter.

Date	MAXIMUM PPM	Duration (min)	Reason	Corrective Action
Waste				
01/01/2012 13:13	15.2	60	Operator Error - Feed Prep	Reduced charge size. Restarted unit.
01/04/2012 22:11	19.6	60	Operator Error - Feed Prep	Reduced charge size. Restarted unit.
01/14/2012 11:03	14.9	59	Malfunction - Lance Purge	Cleared line. Restarted unit.
01/25/2012 12:10	15.6	60	Operator Error - Feed Prep	Reduced charge size. Restarted unit.
02/19/2012 19:28	10.1	21	Malfunction - Lance purge	Cleared lance. Restarted unit.
02/27/2012 14:34	23.4	61	Malfunction - Instrument	Repaired thermocouple. WO#120943. Restarted unit.
03/11/2012 04:11	15.6	60	Malfunction - Combustion Anomaly	Reviewed waste feeds. Restarted unit.
03/22/2012 02:06	11.3	58	Malfunction - Lance Purge	WO#121325. Rebuilt pump. Started unit.
03/24/2012 04:34	35.9	49	Malfunction - Ring Jets	Repaired ring jets. Restarted unit.
03/25/2012 13:24	11.8	44	Operator Error - Combustion Air	Increased air flow. Restarted unit.
		532	Total Minutes	
Fuels				
01/23/2012 13:43	40.8	64	Start-up - Maintenance Outage	Adjust burner.
01/23/2012 16:30	30.9	68	Start-up - Maintenance Outage	Adjust burner.
03/24/2012 19:00	910.9	43	Start-up - Maintenance Outage	Adjust burner.
03/24/2012 19:56	910.9	100	Start-up - Maintenance Outage	Adjust burner.
03/24/2012 21:43	910.9	71	Start-up - Maintenance Outage	Adjust burner.
03/27/2012 14:07	581.6	137	Start-up - Maintenance Outage	Adjust burner.
		483	Total Minutes	

Total Hydrocarbon

Emission Data Summary:

1) Duration of excess emission in reporting period due to (all reported in minutes; excludes monitor downtime events):

- a) Startup / shutdown: 483
- b) Control equipment problems: 248
- c) Process Problems: 0
- d) Other known causes: 224
- e) Unknown causes: 60

2) Total duration of excess emissions: 1,015

3) Total duration of excess emissions X (100) / Total source operating time: 0.81%

CMS Performance Summary:

- 1) CMS downtime in reporting period due to (reported in minutes; does not count preventative maintenance time):
- | | |
|--|-------|
| a) Monitor equipment malfunctions: | 0 |
| b) Non-Monitor equipment malfunctions: | 0 |
| c) Quality assurance calibration: | 0 |
| d) Other known causes: | 0 |
| e) Unknown causes: | 0 |
| 2) Total CMS Downtime: | 0 |
| 3) Total duration of downtime X (100) / Total source operating time: | 0.00% |

B. Malfunctions

As historically required by former terms and conditions, WTI has included all monitor quality assurance, preventative maintenance, and downtime in the exceedance section of the Excess Emissions Report (EER) for all N001 monitors. Malfunctions of the monitor would be reported in the downtime section of the EER. This EER is submitted separate from this Title V report.

End of Report

Bcc: Env. Department

ECF: Air Quarterly Reporting / Title V Permit / Deviation Report

FILE NAME: environ/vince/Title V quarterly and Semi/121Q/T5 q rep121Q.doc



HERITAGE-WTI, INC.
1250 St. George Street
East Liverpool, Ohio 43920-3400
Phone: 330-385-7337
Fax: 330-385-7813
Web Site: www.heritage-wti.com

OHSAS 18001: 2007
ISO 14001: 2004
ISO 9001: 2008

Mr. Eric Bewley
Division of Air Pollution Control
Northeast District Office
2110 East Aurora Road
Twinsburg, Ohio 44087

July 31, 2012
VIA AIR SERVICES

RE: HERITAGE-WTI, INC
QUARTERLY TITLE V REPORT
FACILITY ID 02-15-02-0233
2nd Quarter 2012

Dear Mr. Bewley:


Enclosed is Heritage-WTI, Inc's Quarterly Title V Report required by Section A(c)(ii) of WTI's Title V permit. This report covers the quarterly time period from **April 1, 2012 through June 30, 2012.**

This report reflects monitoring and reporting requirements outlined in the facility Permits to Install 02-18743 and 02-20067 as well as the Heritage-WTI Title V Permit #P0084372. Please note that the installation of emissions unit P006 has not been completed and will not be completed as described in Permit to Install #P0103856. As a result, Heritage-WTI allowed this PTI to expire on March 25, 2010. It is no longer included in this report.

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are certain penalties for submitting false information including the possibility of fine and imprisonment for knowing violations."

As always if you have any questions and/or comments feel free to contact me, or Vince Waggle, at 330-385-7337.

Sincerely,


Frank Murray
General Manager
Heritage-WTI, Inc.



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Enclosure

2012
2nd QUARTER
TITLE V REPORT
FOR
HERITAGE-WTI, INC
July 31, 2012

Section I – General Information

A. Facility Information

Facility ID:	02-15-02-0233
Responsible Official's Name / Title:	Frank Murray General Manager
Street Address:	1250 Saint George Street
City:	East Liverpool
State:	Ohio
Zip Code:	43920
Facility Name:	Heritage-WTI, Inc
Facility Local Contact Name:	Local contact is the same information as given above.

B. Relevant standard(s) or other requirement(s) that is/are the basis for this report:

OAC rule 3745-77-07(A)(3) – Monitoring and related recordkeeping and reporting requirements

C. Are you requesting a waiver of recordkeeping and/or reporting requirements under the applicable relevant standard(s) in conjunction with this report?

☐ Yes ☒ No

If you answered yes, you must submit the application for a waiver of recordkeeping and/or reporting requirements together with this report. The application for waiver should include whatever information you consider useful to convince the Administrator that a waiver of recordkeeping or recording is warranted. (63.10(f)(3))

Section II – Certification

Based upon information and belief formed after a reasonable inquiry, I as a responsible official of the above-mentioned facility, certify the information contained in this report is accurate and true to the best of my knowledge.

Frank Murray, General Manager

Signature: Frank Murray

Date: 7/13/2012

Section III – Title V Permit Quarterly Reporting Requirements

A. Deviation Reporting

Emission units **F001** (Paved and Unpaved Roadways and Parking Areas), **F002** (Loose Solid Waste Receiving and Handling), **F004** (Pneumatic Lime and Activated Charcoal Handling System), and **N001** (Hazardous Waste Incinerator), **P001** (Container Processing) **P003** (Tanker Transfer Station – Bay 2), **P004** (Tanker Transfer Station – Bay 3), and **P005** (Direct Tanker Transfer Station –East Bay) have quarterly deviation reporting requirements as defined by Heritage-WTI's Title V Permit # P0084372.

Emission unit **B006** requires deviation reports to be sent to OEPA- NEDO within 30 days of becoming aware of an occurrence.

F001 Reporting Requirements:

- a. Each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and*

There were no occurrences to report as defined by the reporting requirements for this unit.

- b. Each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.*

There were no occurrences to report as defined by the reporting requirements for this unit.

F002 Reporting Requirements:

- a. Any time when the vapor recovery system was not in operation when waste was processed within this emissions unit;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- b. Any time when emissions in the vapor recovery system were not vented to either the incinerator and/or the carbon adsorption system when waste was processed within this emissions unit;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- c. *Any record indicating the pressure within the vapor recovery system upstream from the ventilation header blower was at or above atmospheric pressure when waste was processed within this emissions unit;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- d. *Any record indicating detectable emissions from the vapor recovery system or from any equipment component of this emissions unit;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- e. *An identification of the days when cracks, openings, broken seals, or any other condition allowing outward flow from the emissions unit were discovered by the daily inspection of the overhead doors and/or enclosure and a description of the corrective action, and when it was performed; and*

There were no occurrences to report as defined by the reporting requirements for this unit.

- f. *An identification of the days during which visible emissions of fugitive dust were observed when the overhead doors were opened and a description of any corrective actions taken, if any, to minimize or eliminate the visible emissions.*

There were no occurrences to report as defined by the reporting requirements for this unit.

F003 Reporting Requirements:

- a. *Each day when the enclosures were not found to be in good operating condition and the corrective actions taken; and*

There were no occurrences to report as defined by the reporting requirements for this unit.

- b. *Each day or week during which any fugitive visible emission were observed and the corrective actions taken.*

There were no occurrences to report as defined by the reporting requirements for this unit.

F004 Reporting Requirements:

- a. *The period of time when the pressure drop across the bag house on the lime silo stack was outside the range specified in section A.III.1;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- b. *Each day when the enclosures were not found to be in good operating condition and the corrective actions taken; and*

There were no occurrences to report as defined by the reporting requirements for this unit.

- c. *Each day or week during which any fugitive visible emission were observed and the corrective actions taken.*

There were no occurrences to report as defined by the reporting requirements for this unit.

P001 Reporting Requirements:

- a. *Any time when the vapor recovery system was not in operation when waste was processed within this emissions unit;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- b. *Any time when emissions in the vapor recovery system were not vented to either the incinerator and/or the carbon adsorption system when waste was processed within this emissions unit;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- c. *Any record indicating the pressure within the vapor recovery system upstream from the ventilation header blower was at or above atmospheric pressure when waste was processed within this emissions unit;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- d. Any record indicating detectable emissions from the vapor recovery system, cover and/ or opening of any container, and/ or any equipment component of this emissions unit;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- e. Each day or week during which any visible emissions were observed and the corrective actions taken.*

There were no occurrences to report as defined by the reporting requirements for this unit.

P003 – P005 Reporting Requirements:

The emissions units have the same reporting requirements and therefore will be combined for the purpose of this report. The specific emission unit will be identified, if necessary, in the contents of this section.

- f. Each day when the number of gallons loaded exceeded 44,000 gallons;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- g. Each day when the calculated loading loss value exceeded 41.9 pounds per 1,000 gallons;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- h. Any time when the vapor recovery system was not in operation when waste was processed within this emissions unit;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- i. Any time when emissions in the vapor recovery system were not vented to either the incinerator and/or the carbon adsorption system when waste was processed within this emissions unit;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- j. *Any record indicating the pressure within the vapor recovery system upstream from the ventilation header blower was at or above atmospheric pressure when waste was processed within this emissions unit;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- k. *Each day when loading occurred without submerged fill;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- l. *Any record indicating detectable emissions from the vapor recovery system or from any equipment component of this emissions unit;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- m. *Any record indicating the loading and unloading activities occurred at the same time within this emissions unit.*

There were no occurrences to report as defined by the reporting requirements for this unit.

N001 Reporting Requirements:

Heritage-WTI is required to submit quarterly reports documenting exceedances of emissions limitations and other operating parameters specified by the Title V Permit #P0084372. In addition, the permit also specifies that Heritage-WTI provide quarterly reports on the performance of the Continuous Monitoring System (CMS).

This Title V Quarterly Report will only contain a summary of the quarter's exceedances and CMS downtime. A more detailed report will be submitted to OEPA under a separated cover letter titled **2nd Quarter Excess Emissions Report**. An additional report titled **2nd Quarter Data Assessment Report** will be sent detailing the results of the periodic Cylinder Gas Audits and Relative Accuracy Test Audits.

Temperature Deviation Summary

Heritage-WTI maintains two temperature Operating Parameter Limits in accordance 40 CFR Part 63, Subpart EEE. Temperature limits for the Rotary Kiln and Secondary Combustion Chamber are necessary maintain the temperature needed to meet the Destruction Removal Efficiency and Dioxin/Furan emission standards established under the HWC MACT.

Kiln Temp Summary

Deviation = < 1718 F 1-hr avg.

Date	MINIMUM TEMP DEG F	Duration (min)	Reason	Corrective Action
04/06/2012 08:19	1022.2	130	Malfunction - Ring Jet Pump	Replaced check valve. Restarted unit.
		130	Total Minutes	

SCC Temp Summary

Deviation = <1747 F 1-hr avg.

Date	MINIMUM TEMP DEG F	Duration (min)	Reason	Corrective Action
04/06/2012 08:19	874.2	130	Malfunction - Ring Jet Pump	Replaced check valve. Restarted unit.
05/30/2012 23:35	1705.7	45	Malfunction - Instrument	Replaced Transmitter. Restarted unit.
06/04/2012 19:44	1744.9	3	Malfunction - Power Failure	Power restored. Unit restarted.
06/04/2012 19:49	1744.7	5	Malfunction - Power Failure	Power restored. Unit restarted.
		183	Total Minutes	

Opacity Summary
 Deviation = > 20% on 6 min. avg.

Date	MAXIMUM OPACITY	Duration (min)	Reason	Corrective Action
04/03/2012 12:30	46.9	12	Waste Feed	Reduced feeds. Restarted unit.
04/06/2012 08:30	26.7	24	Malfunction - Ring Jet Pump	Replaced pump. Restarted unit.
04/19/2012 13:30	49.2	30	Quarterly Stack Audit	None
		66	Total Minutes	

Opacity

Emission Data Summary:

- 1) Duration of excess emission in reporting period due to (all reported in minutes; excludes monitor downtime events):
 - a) Startup / shutdown: 0
 - b) Control equipment problems: 24
 - c) Process Problems: 0
 - d) Other known causes: 42
 - e) Unknown causes: 0
- 2) Total duration of excess emissions: 66
- 3) Total duration of excess emissions X (100) / Total source operating time: 0.05%

CMS Performance Summary:

- 1) CMS downtime in reporting period due to (reported in minutes; does not count preventative maintenance time):
 - a) Monitor equipment malfunctions: 0
 - b) Non-Monitor equipment malfunctions: 0
 - c) Quality assurance calibration: 649
 - d) Other known causes: 0
 - e) Unknown causes: 0
- 2) Total CMS Downtime: 649
- 3) Total duration of downtime X (100) / Total source operating time: 0.52

Sulfur Dioxide Summary

Deviation =>11.34 lbs/hr
 49.69 tons/year

Date	MAXIMUM LB/MMBTU	Duration (min)	Reason	Corrective Action
04/08/2012 11:17	12.1	36	Waste Feeds	Reduced Feed Rates
06/13/2012 05:48	11.8	4	Waste Feeds	Reduced Feed Rates
		40	Total Minutes in Exceedance	
		2	Number of Events	
			Total Emissions for the Quarter	
		1176	(LBS)	
		0.59	(Tons)	

Sulfur Dioxide

Emission Data Summary:

1) Duration of excess emission in reporting period due to (all reported in minutes; excludes monitor downtime events):

- a) Startup / shutdown: 0
- b) Control equipment problems: 0
- c) Process Problems: 0
- d) Other known causes: 40
- e) Unknown causes: 0

2) Total duration of excess emissions: 40

3) Total duration of excess emissions X (100) / Total source operating time: 0.03%

CMS Performance Summary:

1) CMS downtime in reporting period due to (reported in minutes; does not count preventative maintenance time):

- a) Monitor equipment malfunctions: 0
- b) Non-Monitor equipment malfunctions: 0
- c) Quality assurance calibration: 1,969
- d) Other known causes: 3,153
- e) Unknown causes: 0

2) Total CMS Downtime: 5,122

3) Total duration of downtime X (100) / Total source operating time: 4.10%

Nitrogen Oxides Summary

Deviation= >28.36 lbs/hr
124.23 Tons/year

Date	MAXIMUM LB/HR	Duration (min)	Reason	Corrective Action
04/04/2012 02:54	28.5	5	Feed - Lance	Reduced Feed Rates
04/11/2012 07:09	28.7	7	Feed - Lance	Reduced Feed Rates
04/17/2012 19:50	30.1	30	Feed - Lance	Reduced Feed Rates
04/28/2012 10:13	29.6	29	Feed - Lance	Reduced Feed Rates
04/28/2012 11:13	32.2	55	Feed - Lance	Reduced Feed Rates
04/28/2012 13:05	28.8	15	Feed - Lance	Reduced Feed Rates
04/29/2012 01:15	31.3	30	Feed - Lance	Reduced Feed Rates
04/29/2012 01:56	30.3	17	Feed - Lance	Reduced Feed Rates
04/29/2012 08:57	36.3	57	Feed - Lance	Reduced Feed Rates
04/29/2012 14:13	30.2	41	Feed - Lance	Reduced Feed Rates
04/29/2012 20:38	29.5	11	Feed - Lance	Reduced Feed Rates
04/30/2012 15:48	32.1	32	Feed - Lance	Reduced Feed Rates
04/30/2012 21:35	29.4	23	Feed - Lance	Reduced Feed Rates
05/01/2012 06:25	30.2	22	Feed - Lance	Reduced Feed Rates
05/01/2012 07:56	35.5	59	Feed - Lance	Reduced Feed Rates
05/01/2012 12:26	31.3	85	Feed - Lance	Reduced Feed Rates
05/01/2012 14:02	28.5	5	Feed - Lance	Reduced Feed Rates
05/01/2012 17:38	31.4	50	Feed - Lance	Reduced Feed Rates
05/01/2012 22:46	29.3	24	Feed - Lance	Reduced Feed Rates
05/02/2012 06:15	31.8	58	Feed - Lance	Reduced Feed Rates
05/02/2012 19:56	28.4	2	Feed - Lance	Reduced Feed Rates
05/02/2012 23:38	28.6	8	Feed - Lance	Reduced Feed Rates
05/03/2012 03:23	32.9	59	Feed - Lance	Reduced Feed Rates
05/03/2012 08:17	29.7	17	Feed - Lance	Reduced Feed Rates
05/05/2012 17:56	28.7	8	Feed - Lance	Reduced Feed Rates
05/06/2012 07:16	32.4	33	Feed - Lance	Reduced Feed Rates
05/06/2012 18:15	29.2	23	Feed - Lance	Reduced Feed Rates
05/07/2012 04:34	30.9	18	Feed - Lance	Reduced Feed Rates
05/08/2012 10:09	38.3	134	Feed - Lance	Reduced Feed Rates
05/08/2012 13:24	30.3	30	Feed - Lance	Reduced Feed Rates
05/08/2012 16:19	34.0	121	Feed - Lance	Reduced Feed Rates
05/09/2012 09:02	30.0	21	Feed - Lance	Reduced Feed Rates
05/11/2012 22:10	31.3	45	Feed - Lance	Reduced Feed Rates

HERITAGE-WTI, INC.
 QUARTERLY TITLE V REPORT
 FACILITY ID 02-15-02-0233
 2nd QUARTER 2012

05/12/2012 04:37	29.9	37	Feed - Lance	Reduced Feed Rates
05/14/2012 02:12	30.0	43	Feed - Lance	Reduced Feed Rates
05/14/2012 07:14	28.8	6	Feed - Lance	Reduced Feed Rates
05/14/2012 21:40	29.4	13	Feed - Lance	Reduced Feed Rates
05/18/2012 07:05	29.1	7	Feed - Lance	Reduced Feed Rates
05/22/2012 22:45	29.1	11	Feed - Lance	Reduced Feed Rates
Date	MAXIMUM LB/HR	Duration (min)	Reason	Corrective Action
05/25/2012 07:37	29.0	29	Feed - Lance	Reduced Feed Rates
05/25/2012 17:27	29.1	16	Feed - Lance	Reduced Feed Rates
05/26/2012 01:57	34.4	57	Feed - Lance	Reduced Feed Rates
05/26/2012 21:53	37.0	72	Feed - Lance	Reduced Feed Rates
05/28/2012 15:46	29.2	10	Feed - Lance	Reduced Feed Rates
05/28/2012 16:24	31.9	14	Feed - Lance	Reduced Feed Rates
05/29/2012 03:46	29.7	42	Feed - Lance	Reduced Feed Rates
05/29/2012 11:43	29.3	10	Feed - Lance	Reduced Feed Rates
05/29/2012 17:10	32.2	44	Feed - Lance	Reduced Feed Rates
05/30/2012 09:45	29.5	24	Feed - Lance	Reduced Feed Rates
05/30/2012 12:15	30.4	32	Feed - Lance	Reduced Feed Rates
06/02/2012 07:56	36.1	92	Feed - Lance	Reduced Feed Rates
06/02/2012 20:47	39.8	82	Feed - Lance	Reduced Feed Rates
06/03/2012 00:04	32.3	53	Feed - Lance	Reduced Feed Rates
06/03/2012 12:03	28.4	1	Feed - Lance	Reduced Feed Rates
06/04/2012 00:14	29.3	13	Feed - Lance	Reduced Feed Rates
06/04/2012 18:57	35.7	84	Feed - Lance	Reduced Feed Rates
06/05/2012 15:41	30.8	48	Feed - Lance	Reduced Feed Rates
06/07/2012 07:02	32.2	47	Feed - Lance	Reduced Feed Rates
06/09/2012 00:33	31.9	36	Feed - Lance	Reduced Feed Rates
06/09/2012 12:48	28.5	10	Feed - Lance	Reduced Feed Rates
06/10/2012 03:55	28.6	15	Feed - Lance	Reduced Feed Rates
06/13/2012 08:47	29.0	11	Feed - Lance	Reduced Feed Rates
06/17/2012 06:47	32.0	23	Feed - Lance	Reduced Feed Rates
06/21/2012 17:42	28.8	19	Feed - Lance	Reduced Feed Rates
06/22/2012 12:59	29.9	35	Feed - Lance	Reduced Feed Rates
06/25/2012 06:00	30.5	8	Feed - Lance	Reduced Feed Rates
06/28/2012 15:35	31.1	58	Feed - Lance	Reduced Feed Rates
		2276	Total Minutes in Exceedance	
		67	Number of Events	
			Total Emissions for the Quarter	
		43926	(LBS)	
		21.96	(Tons)	

Nitrogen Oxide

Emission Data Summary:

1) Duration of excess emission in reporting period due to (all reported in minutes; excludes monitor downtime events):

a) Startup / shutdown:	0
b) Control equipment problems:	0
c) Process Problems:	0
d) Other known causes:	2276
e) Unknown causes:	0

2) Total duration of excess emissions: 2276

3) Total duration of excess emissions X (100) / Total source operating time: 1.82%

CMS Performance Summary:

1) CMS downtime in reporting period due to (reported in minutes; does not count preventative maintenance time):

a) Monitor equipment malfunctions:	0
b) Non-Monitor equipment malfunctions:	0
c) Quality assurance calibration:	1,969
d) Other known causes:	183
e) Unknown causes:	0

2) Total CMS Downtime: 2,152

3) Total duration of downtime X (100) / Total source operating time: 1.72%

Carbon Monoxide Summary

Deviation = N/A

The HWC MACT (40 CFR Part 63, Subpart EEE) allows facilities the option of choosing to maintain compliance by monitoring either Total Hydrocarbon or Carbon Monoxide emissions. Heritage-WTI has chosen to option of monitoring Total Hydrocarbons. As a result, the facility does not have a short term emission limitation on Carbon Monoxide. The following table shows a summary of Carbon Monoxide emissions for the quarter.

	Date	Time	Lb/MMBtu	Incinerator Operation	Reason	Corrective Action
	Total CO emissions for the quarter:					
			lbs	tons		
			14678	7.34		

Carbon Monoxide

Emission Data Summary:

- 1) Duration of excess emission in reporting period due to (all reported in minutes; excludes monitor downtime events):
 - a) Startup / shutdown: N/A
 - b) Control equipment problems: N/A
 - c) Process Problems: N/A
 - d) Other known causes: N/A
 - e) Unknown causes: N/A
- 2) Total duration of excess emissions: N/A
- 3) Total duration of excess emissions X (100) / Total source operating time: N/A %

CMS Performance Summary:

- 1) CMS downtime in reporting period due to (reported in minutes; does not count preventative maintenance time):
 - a) Monitor equipment malfunctions: 0
 - b) Non-Monitor equipment malfunctions: 0
 - c) Quality assurance calibration: 960
 - d) Other known causes: 26
 - e) Unknown causes: 0
- 2) Total CMS Downtime: 986
- 3) Total duration of downtime X (100) / Total source operating time: 0.79%

Total Hydrocarbon Summary

Deviation => 10 ppmv

The HWC MACT (40 CFR Part 63, Subpart EEE) allows facilities the option of choosing to maintain compliance by monitoring either Total Hydrocarbon or Carbon Monoxide emissions. Heritage-WTI has chosen to option of monitoring Total Hydrocarbons. The following table shows a summary of Total Hydrocarbon exceedances and total emissions for the quarter.

Date	MAXIMUM PPM	Duration (min)	Reason	Corrective Action
Waste				
04/02/2012 17:07	11.0	3	Operator Error - Line Purge	Restarted unit.
04/06/2012 08:38	21.7	111	Malfunction - Ring Jet Pump	Replaced check valve. Restarted unit.
04/16/2012 10:14	11.7	58	Malfunction - Front Wall Burner	Adjusted air damper. Restarted unit.
04/17/2012 16:43	27.6	60	Operator Error - Feed Mix	Reduced waste feeds. Restarted unit.
04/18/2012 00:47	15.9	60	Operator Error - Feed Prep	Removed waste from mix. Restarted unit.
04/18/2012 02:32	30.9	65	Operator Error - Feed Prep	Removed waste from mix. Restarted unit.
04/18/2012 07:40	21.4	61	Operator Error - Feed Prep	Removed waste from mix. Restarted unit.
04/18/2012 09:03	14.4	57	Operator Error - Feed Prep	Removed waste from mix. Restarted unit.
04/18/2012 16:42	14.0	59	Operator Error - Feed Prep	Removed waste from mix. Restarted unit.
04/20/2012 09:00	10.2	35	Malfunction - Combustion Anomaly	Reviewed waste feeds. Restarted unit.
04/28/2012 10:43	10.4	23	Malfunction - Combustion Anomaly	Reviewed waste feeds. Restarted unit.
04/29/2012 08:40	28.6	60	Malfunction - Customer Packaging Error	Contacted customer. Restarted unit.
04/30/2012 07:43	23.4	61	Operator Error - Feed Size	Removed waste stream from mix.
04/30/2012 08:52	38.0	62	Operator Error - Feed Size	Removed waste stream from mix.
05/03/2012 19:33	10.1	29	Operator Error - Feed Size	Restarted unit. Reduced charge size.
05/05/2012 20:15	15.7	59	Malfunction - Combustion Anomaly	Reviewed waste feeds. Restarted unit.
05/11/2012 13:15	22.5	61	Malfunction - Lance Purge	Cleared lance. Restarted unit.
05/11/2012 20:05	12.3	54	Operator Error - Feed Size	Restarted unit. Reduced charge size.
05/12/2012 14:40	22.4	60	Malfunction - Combustion Anomaly	Reviewed waste feeds. Restarted unit.
05/13/2012 21:41	21.9	60	Operator Error - Feed Size	Restarted unit. Reduced charge size.
05/14/2012 19:38	18.0	60	Operator Error - Lance Feed	Restarted unit. Reduced flow.
05/15/2012 18:52	12.4	35	Malfunction - Lance Purge	Restarted unit. Cleared lance.
05/16/2012 10:23	14.6	50	Operator Error - Feed Mix	Restarted unit. Reduced feeds.
05/24/2012 07:14	18.6	59	Operator Error - Feed Size	Restarted unit. Reduced charge size.
05/29/2012 16:52	11.3	57	Operator Error - Feed Size	Restarted unit. Reduced charge size.
06/01/2012 03:19	11.1	53	Operator Error - Waste Inspection	Restarted unit. Program logic changed.
06/05/2012 05:04	10.4	12	Malfunction - Combustion Anomaly	Reviewed waste feeds. Restarted unit.
06/19/2012 08:55	10.4	19	Malfunction - Instrument	Restarted computer. Restarted unit.
06/19/2012 10:28	16.9	59	Operator Error - Data Quality	Restart unit. Correct data problem.
06/20/2012 10:58	10.4	2	Malfunction - Combustion Anomaly	Reviewed waste feeds. Restarted unit.
06/22/2012 19:17	10.2	16	Operator Error - Feed Prep	Reduced charge size. Restarted unit.
06/26/2012 23:13	28.7	61	Operator Error - Feed Prep	Reduced charge size. Restarted unit.
		1581	Minutes in Exceedance on Waste	

Date	MAXIMUM PPM	Duration (min)	Reason	Corrective Action
Fuels				
04/07/2012 01:07	50.1	112	Start-up	Adjusted Burner
04/23/2012 16:44	19.2	13	Start-up	Adjusted Burner
04/25/2012 16:04	14.4	435	Start-up	Adjusted Burner
05/10/2012 15:53	17.3	36	Start-up	Adjusted Burner
05/24/2012 19:54	34.3	118	Start-up	Adjusted Burner
		714	Minutes in Exceedance on Fuels	
		2295	Total Minutes in Exceedance	
		32	Number of Events	
			Total Emissions for the Quarter	
		476	(LBS)	
		0.24	(Tons)	

Total Hydrocarbon

Emission Data Summary:

1) Duration of excess emission in reporting period due to (all reported in minutes; excludes monitor downtime events):

- a) Startup / shutdown: 714
- b) Control equipment problems: 188
- c) Process Problems: 96
- d) Other known causes: 1106
- e) Unknown causes: 191

2) Total duration of excess emissions: 2,295

3) Total duration of excess emissions X (100) / Total source operating time: 1.84%

CMS Performance Summary:

1) CMS downtime in reporting period due to (reported in minutes; does not count preventative maintenance time):

- a) Monitor equipment malfunctions: 0
- b) Non-Monitor equipment malfunctions: 0
- c) Quality assurance calibration: 0
- d) Other known causes: 0
- e) Unknown causes: 0

2) Total CMS Downtime: 0

3) Total duration of downtime X (100) / Total source operating time: 0.00%

B. Malfunctions

As historically required by former terms and conditions, WTI has included all monitor quality assurance, preventative maintenance, and downtime in the exceedance section of the Excess Emissions Report (EER) for all N001 monitors. Malfunctions of the monitor would be reported in the downtime section of the EER. This EER is submitted separate from this Title V report.

End of Report

Bcc: Env. Department

ECF: Air Quarterly Reporting / Title V Permit / Deviation Report

FILE NAME: environ/vince/Title V quarterly and Semi/122Q/T5 q rep122Q.doc



HERITAGE-WTI, INC.
1250 St. George Street
East Liverpool, Ohio 43920-3400
Phone: 330-385-7337
Fax: 330-385-7813
Web Site: www.heritage-wti.com

OHSAS 18001: 2007
ISO 14001: 2004
ISO 9001: 2008

Mr. Eric Bewley
Division of Air Pollution Control
Northeast District Office
2110 East Aurora Road
Twinsburg, Ohio 44087

October 31, 2012
VIA AIR SERVICES

RE: HERITAGE-WTI, INC
QUARTERLY TITLE V REPORT
FACILITY ID 02-15-02-0233
3rd Quarter 2012

Dear Mr. Bewley:

Enclosed is Heritage-WTI, Inc's Quarterly Title V Report required by Section A(c)(ii) of WTI's Title V permit. This report covers the quarterly time period from **July 1, 2012 through September 30, 2012.**

This report reflects monitoring and reporting requirements outlined in the facility Permits to Install 02-18743 and 02-20067 as well as the Heritage-WTI Title V Permit #P0084372. Please note that the installation of emissions unit P006 has not been completed and will not be completed as described in Permit to Install #P0103856. As a result, Heritage-WTI allowed this PTI to expire on March 25, 2010. It is no longer included in this report.

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are certain penalties for submitting false information including the possibility of fine and imprisonment for knowing violations."

As always if you have any questions and/or comments feel free to contact me, or Vince Waggle, at 330-385-7337.

Sincerely,

A handwritten signature in black ink, appearing to read "John Avdellas", written over a horizontal line.

John Avdellas
Vice-President
Heritage-WTI, Inc.



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Enclosure

2012
3rd QUARTER
TITLE V REPORT

FOR

HERITAGE-WTI, INC

October 31, 2012

Section I – General Information

A. Facility Information

Facility ID:	02-15-02-0233
Responsible Official's Name / Title:	John Avdellas Vice President
Street Address:	1250 Saint George Street
City:	East Liverpool
State:	Ohio
Zip Code:	43920
Facility Name:	Heritage-WTI, Inc
Facility Local Contact Name:	Local contact is the same information as given above.

B. Relevant standard(s) or other requirement(s) that is/are the basis for this report:

OAC rule 3745-77-07(A)(3) – Monitoring and related recordkeeping and reporting requirements

C. Are you requesting a waiver of recordkeeping and/or reporting requirements under the applicable relevant standard(s) in conjunction with this report?

☐ Yes ☒ No

If you answered yes, you must submit the application for a waiver of recordkeeping and/or reporting requirements together with this report. The application for waiver should include whatever information you consider useful to convince the Administrator that a waiver of recordkeeping or recording is warranted. (63.10(f)(3))

Section II – Certification

Based upon information and belief formed after a reasonable inquiry, I as a responsible official of the above-mentioned facility, certify the information contained in this report is accurate and true to the best of my knowledge.

John Avdellas, Vice President

Signature: _____

Date: 10/25/12

Section III – Title V Permit Quarterly Reporting Requirements

A. Deviation Reporting

Emission units **F001** (Paved and Unpaved Roadways and Parking Areas), **F002** (Loose Solid Waste Receiving and Handling), **F004** (Pneumatic Lime and Activated Charcoal Handling System), and **N001** (Hazardous Waste Incinerator), **P001** (Container Processing) **P003** (Tanker Transfer Station – Bay 2), **P004** (Tanker Transfer Station – Bay 3), and **P005** (Direct Tanker Transfer Station –East Bay) have quarterly deviation reporting requirements as defined by Heritage-WTI's Title V Permit # P0084372.

Emission unit **B006** requires deviation reports to be sent to OEPA- NEDO within 30 days of becoming aware of an occurrence.

F001 Reporting Requirements:

- a. *Each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and*

There were no occurrences to report as defined by the reporting requirements for this unit.

- b. *Each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.*

There were no occurrences to report as defined by the reporting requirements for this unit.

F002 Reporting Requirements:

- a. *Any time when the vapor recovery system was not in operation when waste was processed within this emissions unit;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- b. *Any time when emissions in the vapor recovery system were not vented to either the incinerator and/or the carbon adsorption system when waste was processed within this emissions unit;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- c. *Any record indicating the pressure within the vapor recovery system upstream from the ventilation header blower was at or above atmospheric pressure when waste was processed within this emissions unit;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- d. *Any record indicating detectable emissions from the vapor recovery system or from any equipment component of this emissions unit;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- e. *An identification of the days when cracks, openings, broken seals, or any other condition allowing outward flow from the emissions unit were discovered by the daily inspection of the overhead doors and/or enclosure and a description of the corrective action, and when it was performed; and*

There were no occurrences to report as defined by the reporting requirements for this unit.

- f. *An identification of the days during which visible emissions of fugitive dust were observed when the overhead doors were opened and a description of any corrective actions taken, if any, to minimize or eliminate the visible emissions.*

There were no occurrences to report as defined by the reporting requirements for this unit.

F003 Reporting Requirements:

- a. *Each day when the enclosures were not found to be in good operating condition and the corrective actions taken; and*

There were no occurrences to report as defined by the reporting requirements for this unit.

- b. *Each day or week during which any fugitive visible emission were observed and the corrective actions taken.*

There were no occurrences to report as defined by the reporting requirements for this unit.

F004 Reporting Requirements:

- a. *The period of time when the pressure drop across the bag house on the lime silo stack was outside the range specified in section A.III.1;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- b. *Each day when the enclosures were not found to be in good operating condition and the corrective actions taken; and*

There were no occurrences to report as defined by the reporting requirements for this unit.

- c. *Each day or week during which any fugitive visible emission were observed and the corrective actions taken.*

There were no occurrences to report as defined by the reporting requirements for this unit.

P001 Reporting Requirements:

- a. *Any time when the vapor recovery system was not in operation when waste was processed within this emissions unit;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- b. *Any time when emissions in the vapor recovery system were not vented to either the incinerator and/or the carbon adsorption system when waste was processed within this emissions unit;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- c. *Any record indicating the pressure within the vapor recovery system upstream from the ventilation header blower was at or above atmospheric pressure when waste was processed within this emissions unit;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- d. Any record indicating detectable emissions from the vapor recovery system, cover and/ or opening of any container, and/ or any equipment component of this emissions unit;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- e. Each day or week during which any visible emissions were observed and the corrective actions taken.*

There were no occurrences to report as defined by the reporting requirements for this unit.

P003 – P005 Reporting Requirements:

The emissions units have the same reporting requirements and therefore will be combined for the purpose of this report. The specific emission unit will be identified, if necessary, in the contents of this section.

- f. Each day when the number of gallons loaded exceeded 44,000 gallons;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- g. Each day when the calculated loading loss value exceeded 41.9 pounds per 1,000 gallons;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- h. Any time when the vapor recovery system was not in operation when waste was processed within this emissions unit;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- i. Any time when emissions in the vapor recovery system were not vented to either the incinerator and/or the carbon adsorption system when waste was processed within this emissions unit;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- j. Any record indicating the pressure within the vapor recovery system upstream from the ventilation header blower was at or above atmospheric pressure when waste was processed within this emissions unit;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- k. Each day when loading occurred without submerged fill;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- l. Any record indicating detectable emissions from the vapor recovery system or from any equipment component of this emissions unit;*

There were no occurrences to report as defined by the reporting requirements for this unit.

- m. Any record indicating the loading and unloading activities occurred at the same time within this emissions unit.*

There were no occurrences to report as defined by the reporting requirements for this unit.

N001 Reporting Requirements:

Heritage-WTI is required to submit quarterly reports documenting exceedances of emissions limitations and other operating parameters specified by the Title V Permit #P0084372. In addition, the permit also specifies that Heritage-WTI provide quarterly reports on the performance of the Continuous Monitoring System (CMS).

This Title V Quarterly Report will only contain a summary of the quarter's exceedances and CMS downtime. A more detailed report will be submitted to OEPA under a separated cover letter titled **3rd Quarter Excess Emissions Report**. An additional report titled **3rd Quarter Data Assessment Report** will be sent detailing the results of the periodic Cylinder Gas Audits and Relative Accuracy Test Audits.

Temperature Deviation Summary

Heritage-WTI maintains two temperature Operating Parameter Limits in accordance 40 CFR Part 63, Subpart EEE. Temperature limits for the Rotary Kiln and Secondary Combustion Chamber are necessary maintain the temperature needed to meet the Destruction Removal Efficiency and Dioxin/Furan emission standards established under the HWC MACT.

Kiln Temp Summary

Deviation = < 1718 F 1-hr avg.

Date	MINIMUM TEMP DEG F	Duration (min)	Reason	Corrective Action	
07/03/2012 20:32	1183.8	64	Malfunction - Equipment	Gasket replaced. Unit restarted.	
09/03/2012 21:53	1321.3	193	Malfunction - Power Failure	City power stabilized. Unit restarted.	
		257	Total Minutes		

SCC Temp Summary

Deviation = <1747 F 1-hr avg.

Date	MINIMUM TEMP DEG F	Duration (min)	Reason	Corrective Action	
07/03/2012 20:25	1153.2	71	Malfunction - Equipment	Gasket replaced. Unit restarted.	
09/03/2012 21:53	1232.0	202	Malfunction - Power Failure	City power stabilized. Unit restarted.	
		273	Total Minutes		

Opacity Summary
 Deviation => 20% on 6 min. avg.

Date	MAXIMUM OPACITY	Duration (min)	Reason	Corrective Action
09/03/2012 14:54	52.8	6	Malfunction - Steam Loss	Cleared Line
09/05/2012 06:54	22.8	6	Feed - Drum	Start Pink Plume Suppression
09/11/2012 13:12	49.5	36	Quarterly Stack Audit	None
		48	Total Minutes	

Opacity

Emission Data Summary:

1) Duration of excess emission in reporting period due to (all reported in minutes; excludes monitor downtime events):

- a) Startup / shutdown: 0
- b) Control equipment problems: 6
- c) Process Problems: 0
- d) Other known causes: 42
- e) Unknown causes: 0

2) Total duration of excess emissions: 48

3) Total duration of excess emissions X (100) / Total source operating time: 0.04%

CMS Performance Summary:

1) CMS downtime in reporting period due to (reported in minutes; does not count preventative maintenance time):

- a) Monitor equipment malfunctions: 0
- b) Non-Monitor equipment malfunctions: 0
- c) Quality assurance calibration: 646
- d) Other known causes: 0
- e) Unknown causes: 0

2) Total CMS Downtime: 646

3) Total duration of downtime X (100) / Total source operating time: 0.56

Sulfur Dioxide Summary

Deviation =>11.34 lbs/hr
 49.69 tons/year

Date	MAXIMUM LB/MMBTU	Duration (min)	Reason	Corrective Action
07/13/2012 08:50	22.4	62	Feed - Unknown	Adjust Feed Rates
		62	Total Minutes	

Sulfur Dioxide

Emission Data Summary:

- 1) Duration of excess emission in reporting period due to (all reported in minutes; excludes monitor downtime events):
 - a) Startup / shutdown: 0
 - b) Control equipment problems: 0
 - c) Process Problems: 0
 - d) Other known causes: 62
 - e) Unknown causes: 0
- 2) Total duration of excess emissions: 62
- 3) Total duration of excess emissions X (100) / Total source operating time: 0.05%

CMS Performance Summary:

- 1) CMS downtime in reporting period due to (reported in minutes; does not count preventative maintenance time):
 - a) Monitor equipment malfunctions: 0
 - b) Non-Monitor equipment malfunctions: 0
 - c) Quality assurance calibration: 1,910
 - d) Other known causes: 1,585
 - e) Unknown causes: 0
- 2) Total CMS Downtime: 3,495
- 3) Total duration of downtime X (100) / Total source operating time: 3.03%

Nitrogen Oxides Summary

Deviation=>28.36 lbs/hr
 124.23 Tons/year

Date	MAXIMUM LB/HR	Duration (min)	Reason	Corrective Action
07/01/2012 13:32	28.8	9	Feed - Drum	Reduced Feed Rates
07/02/2012 06:46	28.6	8	Feed - Drum	Reduced Feed Rates
08/30/2012 14:44	31.9	49	Feed - Lance	Reduced Feed Rates
08/30/2012 16:21	31.4	30	Feed - Lance	Reduced Feed Rates
		96	Total Minutes	

Nitrogen Oxide

Emission Data Summary:

1) Duration of excess emission in reporting period due to (all reported in minutes; excludes monitor downtime events):

- a) Startup / shutdown: 0
- b) Control equipment problems: 0
- c) Process Problems: 0
- d) Other known causes: 96
- e) Unknown causes: 0

2) Total duration of excess emissions: 96

3) Total duration of excess emissions X (100) / Total source operating time: 0.08%

CMS Performance Summary:

1) CMS downtime in reporting period due to (reported in minutes; does not count preventative maintenance time):

- a) Monitor equipment malfunctions: 0
- b) Non-Monitor equipment malfunctions: 0
- c) Quality assurance calibration: 1,910
- d) Other known causes: 179
- e) Unknown causes: 0

2) Total CMS Downtime: 2,089

3) Total duration of downtime X (100) / Total source operating time: 1.81%

Carbon Monoxide Summary

Deviation = N/A

The HWC MACT (40 CFR Part 63, Subpart EEE) allows facilities the option of choosing to maintain compliance by monitoring either Total Hydrocarbon or Carbon Monoxide emissions. Heritage-WTI has chosen to option of monitoring Total Hydrocarbons. As a result, the facility does not have a short term emission limitation on Carbon Monoxide. The following table shows a summary of Carbon Monoxide emissions for the quarter.

Date	Time	Lb/MMBtu	Incinerator Operation
Total CO emissions for the quarter:			
		lbs	tons
		13663	6.83

Carbon Monoxide

Emission Data Summary:

- 1) Duration of excess emission in reporting period due to (all reported in minutes; excludes monitor downtime events):
 - a) Startup / shutdown: N/A
 - b) Control equipment problems: N/A
 - c) Process Problems: N/A
 - d) Other known causes: N/A
 - e) Unknown causes: N/A
- 2) Total duration of excess emissions: N/A
- 3) Total duration of excess emissions X (100) / Total source operating time: N/A %

CMS Performance Summary:

- 1) CMS downtime in reporting period due to (reported in minutes; does not count preventative maintenance time):
 - a) Monitor equipment malfunctions: 0
 - b) Non-Monitor equipment malfunctions: 0
 - c) Quality assurance calibration: 923
 - d) Other known causes: 11
 - e) Unknown causes: 0
- 2) Total CMS Downtime: 934
- 3) Total duration of downtime X (100) / Total source operating time: 0.81%

Total Hydrocarbon Summary

Deviation => 10 ppmv

The HWC MACT (40 CFR Part 63, Subpart EEE) allows facilities the option of choosing to maintain compliance by monitoring either Total Hydrocarbon or Carbon Monoxide emissions. Heritage-WTI has chosen to option of monitoring Total Hydrocarbons. The following table shows a summary of Total Hydrocarbon exceedances and total emissions for the quarter.

Date	MAXIMUM PPM	Duration (min)	Reason	Corrective Action
Waste				
07/05/2012 17:56	11.2	5	Malfunction - Combustion Anomaly	Reviewed waste feeds. Restarted unit.
07/13/2012 09:50	14.6	46	Malfunction -Lance Purge	Cleared line. Restarted unit.
07/14/2012 08:17	17.1	59	Operator Error - Container inspection	Restart unit.
07/16/2012 17:25	14.6	59	Operator Error -Feed Prep	Reduce charges. Restart unit.
07/24/2012 20:26	11.5	50	Malfunction - Lance Plugging	Cleared lance . Restarted unit.
07/28/2012 19:24	10.1	8	Malfunction - Combustion Anomaly	Reviewed waste feeds. Restarted unit.
07/31/2012 16:53	21.2	51	Operator Error -Feed Prep	Reduce charges. Restart unit.
08/03/2012 18:26	10.7	58	Operator Error -Feed Prep	Reduce charges. Restart unit.
08/13/2012 11:59	10.0	19	Operator Error -Feed Mix	Reduce charges. Restart unit.
08/27/2012 21:09	21.2	60	Operator Error -Feed Prep	Reduce charges. Restart unit.
08/29/2012 13:44	10.2	2	Malfunction - Computer	Corrected computer timing. Restarted unit.
08/31/2012 16:54	16.9	60	Operator Error -Feed Prep	Reduce charges. Restart unit.
09/07/2012 00:07	20.7	60	Operator Error -Feed Prep	Reduce charges. Restart unit.
09/21/2012 18:52	10.2	57	Operator Error -Feed Prep	Reduce charges. Restart unit.
09/21/2012 20:49	18.5	60	Operator Error -Feed Prep	Reduce charges. Restart unit.
		654	Total Minutes	
Fuels				
07/03/2012 22:17	18.9	8	Start-up - Unit Maintenance	Adjust burner.
07/12/2012 21:59	41.6	62	Start-up - Unit Maintenance	Adjust burner.
07/12/2012 23:50	10.3	15	Start-up - Unit Maintenance	Adjust burner.
07/13/2012 00:12	12.5	129	Start-up - Unit Maintenance	Adjust burner.
07/13/2012 08:27	11.9	45	Start-up - Unit Maintenance	Adjust burner.
		259	Total Minutes	

Total Hydrocarbon Emission Data Summary:

1) Duration of excess emission in reporting period due to (all reported in minutes; excludes monitor downtime events):

a) Startup / shutdown:	259
b) Control equipment problems:	2
c) Process Problems:	96
d) Other known causes:	543
e) Unknown causes:	13

- | | |
|--|-------|
| 2) Total duration of excess emissions: | 913 |
| 3) Total duration of excess emissions X (100) / Total source operating time: | 0.79% |

CMS Performance Summary:

1) CMS downtime in reporting period due to (reported in minutes; does not count preventative maintenance time):

- | | |
|--|-------|
| a) Monitor equipment malfunctions: | 0 |
| b) Non-Monitor equipment malfunctions: | 0 |
| c) Quality assurance calibration: | 0 |
| d) Other known causes: | 1 |
| e) Unknown causes: | 0 |
| 2) Total CMS Downtime: | 0 |
| 3) Total duration of downtime X (100) / Total source operating time: | 0.00% |

B. Malfunctions

As historically required by former terms and conditions, WTI has included all monitor quality assurance, preventative maintenance, and downtime in the exceedance section of the Excess Emissions Report (EER) for all N001 monitors. Malfunctions of the monitor would be reported in the downtime section of the EER. This EER is submitted separate from this Title V report.

End of Report